

# Exhibit 1

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**JONATHAN VILLAREAL,  
individually and derivatively on behalf of  
ZROBLACK LLC,  
Plaintiff,**

**v.**

**JOHN SAENZ; MIGUEL VILLAREAL,  
JR.; and GUNN, LEE & CAVE, P.C.,  
Defendants.**

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**No. 5:20-CV-00571-OG**

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**AFFIDAVIT OF DAVID VANDERHIDER**

BEFORE ME, the undersigned notary, on this day appeared David Vanderhider, the “Affiant,” and a person whose identity is known to me. After being duly sworn, the Affiant stated as follows:

1. My name is David Vanderhider.<sup>1</sup> I am over 18 years of age, of sound mind, and am fully competent in all respects to make this affidavit. I have never been convicted of a felony or crime of moral turpitude. The facts stated in this affidavit are true and correct and are within my personal knowledge or were derived from true and correct copies of the business records of Dykema Gossett PLLC.

2. I am a Member of the law firm of Dykema Gossett PLLC (“Dykema”), located at 112 East Pecan Street, Suite 1800, San Antonio, Texas 78205. I have been admitted to practice law in the State of Texas since 2009, and have been engaged in the practice of law continuously since that time. I am a member in good standing of the State Bar of Texas, and I am admitted to practice before the United States District Courts for the Western, Southern, and Eastern Districts of Texas.

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<sup>1</sup> A true and correct copy of my CV is attached as Exhibit C to this Affidavit.

3. Defendant John Saenz (“Defendant” or “Saenz”) retained Dykema to represent him in the above-styled proceeding filed by Plaintiffs Jonathan Villareal (“Villareal”) and ZroBlack, LLC (“ZroBlack”) (collectively, “Plaintiffs”). I am lead counsel, and an attorney of record, for Saenz.

4. I am personally familiar with the issues and allegations raised in this case, and with the records of Dykema as they relate to services performed on behalf of Saenz in this proceeding. I have directed and supervised the performance of such services and have reviewed and familiarized myself with Dykema’s billing records in this case, including the detailed explanation of charges and all services performed.

5. This case was initiated when Plaintiffs filed their Original Complaint (the “Original Complaint”) and an Application for Seizure, Temporary Restraining Order, Preliminary Injunction, and Permanent Injunctive Relief (the “Original Application”) on May 8, 2020. The Original Complaint was thirty-six (36) pages long and asserted eight claims against Saenz. The Original Application was forty-five (45) pages long and included twenty-seven (27) separate exhibits. Saenz filed a Motion to Dismiss on June 23, 2020, which was fully briefed by both Plaintiffs and Saenz.

6. Before Saenz’s Motion to Dismiss was decided, the case was referred to United States Magistrate Judge Richard B. Farrer for disposition of all pretrial matters. Plaintiffs then sought leave to file an amended complaint and application under seal, which Saenz opposed. Ultimately, Plaintiffs’ motion for leave was granted, and Plaintiffs filed their First Amended Verified Complaint (the “First Amended Verified Complaint”) and First Amended Application for Seizure, Temporary Restraining Order, Preliminary Injunction, and Permanent Injunctive Relief (the “First Amended Application”) on January 15, 2021.

7. The First Amended Verified Complaint is fifty-six (56) pages long and includes nine claims against Saenz: (1) misappropriation of trade secrets; (2) computer fraud and abuse; (3) violation of the Anti-Cybersquatting Consumer Protection Act; (4) breach of contract; (5) breach of fiduciary duties; (6) tortious interference with prospective relations; (7) conversion; (8) violation of the Texas Theft Liability Act; and (9) fraud. The First Amended Application is sixty (60) pages long and includes 41 separate exhibits. Saenz filed a Motion to Dismiss Plaintiffs' First Amended Verified Complaint and First Amended Application on February 4, 2021. On May 18, 2021, Judge Farrer signed a Report and Recommendation (ECF No. 59) regarding Saenz's Motion to Dismiss. The Court adopted the Report and Recommendation in full in the Court's August 4, 2021 Order (ECF No. 67). In pertinent part, the Order granted in part and denied in part Saenz's Motion to Dismiss. "Only Plaintiffs' claims against Defendant Saenz for breach of fiduciary duty and for violations of the CFAA and ACPA – insofar as these claims are premised on Saenz's alleged conduct after the parties executed the Release" – survived the Motion to Dismiss.

8. On June 25, 2021, the Court granted the Motion to Withdraw by former counsel for Plaintiffs. *See* ECF No. 62. The Court also advised that ZroBlack could "only be represented by licensed counsel" and "needs to obtain counsel and have them enter an appearance on the docket within 30 days . . . in order to avoid dismissal of its claims." *Id.* Plaintiffs subsequently sought additional time to obtain counsel (ECF No. 66), which Saenz did not oppose. On August 6, 2021, the Court entered a Text Order granting Plaintiffs' Motion for Extension of Time as unopposed. The Text Order provided that "Plaintiff is granted an extension and shall have up to and including September 20, 2021 to obtain a new attorney" and that "ZroBlack must have counsel enter an appearance on the docket in order to avoid dismissal of its claims."

9. On August 18, 2021, Saenz filed his Original Answer to Plaintiffs' First Amended Verified Complaint and Original Counterclaim Against Villareal and ZroBlack (the "Original Answer and Original Counterclaim") (ECF No. 69), denying the claims asserted by Plaintiffs and asserting counterclaims for breach of contract and fraudulent inducement. *Id.* at 54-57. Plaintiffs failed to file answers to the counterclaims.

10. On November 18, 2021, following ZroBlack's failure to obtain new counsel, Judge Farrer signed another Report and Recommendation (ECF No. 74) recommending that "all claims asserted by ZroBlack against the remaining Defendant John Saenz be DISMISSED" for failure to comply with the Court's order and reminders. Judge Farrer also ordered that Saenz address, within 21 days, "whether and to what extent Plaintiff Jonathan Villareal has any remaining individual claims in this action." ECF No. 74 at 1. On December 9, 2021, this Court adopted the Report and Recommendation in full (ECF No. 77) and ordered that all of ZroBlack's claims against Saenz be dismissed with prejudice.

11. On December 9, 2021, Saenz filed a Motion for Judgment on the Pleadings or, in the Alternative, Motion to Dismiss the Claims Asserted by Jonathan Villareal, Individually, requesting that the Court clarify the pending claims and either: (1) enter a judgment on the pleadings against Villareal based on the fact that Villareal has no remaining claims in his individual capacity, or (2) dismiss, with prejudice, any claims asserted by Villareal in his individual capacity. ECF No. 76 at 3.

12. On March 4, 2022, Judge Farrer signed a Report and Recommendation (ECF No. 78) recommending that the Court grant the Motion for Judgment on the Pleadings and "DISMISS all individually held claims asserted by Plaintiff Jonathan Villareal against Defendant John Saenz, to the extent any such claims remain at issue." ECF No. 78 at 1. Judge Farrer also

ordered Saenz to address, within 21 days, “whether and to what extent he desires to pursue his counterclaims against Villareal and ZroBlack, LLC.” *Id.*

13. The Court adopted the Report in full in the Court’s March 25, 2022 Order (the “Order”) (ECF No. 80). The Order dismissed all claims asserted by Villareal against Saenz, to the extent any remaining claims exist. ECF No. 80 at 2. That same day, Saenz filed a Motion to Dismiss Counterclaims Without Prejudice and to Enter Judgment (ECF No. 81) seeking: (1) dismissal, without prejudice, of Saenz’s counterclaims asserted against Plaintiffs; and (2) entry of a judgment by the Court confirming: (a) dismissal of all of Plaintiffs’ claims against Saenz with prejudice, and (b) dismissal of Saenz’s counterclaims without prejudice.

14. On March 30, 2022, the Court entered a Final Judgment granting Saenz’s Motion to Dismiss Counterclaims Without Prejudice and to Enter Judgment and ordering, in pertinent part, that: (a) all claims and causes of action against Saenz by Plaintiffs are dismissed with prejudice; and (b) Saenz’s counterclaims asserted against Plaintiffs are dismissed without prejudice (ECF No. 83).

15. This affidavit is submitted to describe the attorneys’ fees incurred by Saenz from June 12, 2020 through April 12, 2022 and to outline the amount of attorneys’ fees for which Saenz seeks recovery from Plaintiffs. As demonstrated in detail below, Saenz does not seek recovery of all attorneys’ fees incurred in this case. Rather, as discussed further herein, Saenz has applied a 50% reduction for fees incurred in connection with Saenz’s Original Answer and Original Counterclaim. In several instances, counsel for Saenz also reduced or removed certain fees that Saenz otherwise would have incurred where indicated on the attached invoices. Additionally, Saenz is not seeking recovery of any costs incurred throughout this litigation.

16. With respect to Plaintiffs' claims for (1) misappropriation of trade secrets; (2) computer fraud and abuse; (3) violation of the Anti-Cybersquatting Consumer Protection Act; (4) breach of contract; (5) breach of fiduciary duties; (6) tortious interference with prospective relations; (7) conversion; (8) violation of the Texas Theft Liability Act; and (9) fraud against Saenz, the legal services performed on behalf of Saenz included, but were not limited, to the following items, all of which were reasonable and necessary to the successful defense of the case:

- (a) Research related to Plaintiffs' allegations and claims.
- (b) Research related to Saenz's defenses.
- (c) Extensive review of key documents relating to Plaintiffs' claims and supporting Saenz's defenses, including the Release.
- (d) Preparation and supplementation of pleadings, motions, and responses and replies to motions.
- (e) Briefing on Saenz's motions to dismiss Plaintiffs' claims.
- (f) Briefing on Villareal's Motion for Sanctions.
- (g) Strategizing and coordination with Mr. Saenz and expert(s).
- (h) Negotiations with Plaintiffs and/or Plaintiffs' former counsel.
- (i) Attendance at hearings.
- (j) Briefing on Saenz's request for attorneys' fees.

17. I am familiar with the reasonable attorneys' fees customarily charged by attorneys in Bexar County, Texas for suits involving the types of claims asserted in this matter, and also for services similar to those performed in this case. I am aware of the work performed by Dykema in this case and the fees charged by Dykema in connection with that work.

18. Dykema actually expended a total of 410.50 hours of attorney and professional time through December 13, 2021, on the topics stated in the attachment at Exhibit “A”, resulting in a total charge of \$142,744.50 for professional services rendered in this matter during that time. This amount represents those fees billed to Saenz through December 13, 2021, less any costs incurred. Saenz has also incurred \$23,056.50 in fees for work in progress, or “WIP,” for March 4 through April 12, 2022. *See* Exhibit “A.” This amount will be billed in the ordinary course of Dykema’s business, and Saenz is responsible for paying this amount to Dykema. Thus, Saenz has incurred a total of \$165,801.00 in attorneys’ fees from June 12, 2020 through April 12, 2022.

19. The records attached to this affidavit at Exhibits “A” and “B” are true and correct copies of Dykema’s business records and accurately reflect the amount of attorneys’ fees for which Saenz is responsible in this case. The records are kept by Dykema in the regular course of business, and it was the regular practice and course of business of Dykema for an employee or representative with knowledge of the act, event, condition, opinion, or diagnosis recorded to make, transmit or transcribe the information to be included in such records. The records were made at or near the time of the events or matters recorded or reasonably soon thereafter. The records are an exact duplicate of the originals.

20. The chart below sets forth the professionals whose time was billed to this matter since June 12, 2020, and the billing rate for each attorney or paralegal.

| <b>Professional</b>  | <b>Rate</b> | <b>Category of Professional</b> | <b>Years of Experience</b> | <b>License Year (Attorneys)</b> |
|----------------------|-------------|---------------------------------|----------------------------|---------------------------------|
| David A. Vanderhider | \$375.00    | Member                          | 13                         | 2009                            |
| Melanie L. Fry       | \$375.00    | Member                          | 13                         | 2009                            |
| Ryan J. Sullivan     | \$325.00    | Associate                       | 8                          | 2014                            |
| Daniel A. Ray        | \$325.00    | Associate                       | 7                          | 2015                            |



|                       |                                    |                  |          |      |
|-----------------------|------------------------------------|------------------|----------|------|
| Elizabeth L. Hartsell | \$325.00                           | Associate        | 5        | 2017 |
| Barbie Celaya         | \$200.00<br>-\$250.00<br>-\$265.00 | Paralegal        | 32       | N/A  |
| Dina Foster           | \$205.00                           | Paralegal        | 18       | N/A  |
| Victoria Flores       | \$160.00                           | Paralegal        | 6 months | N/A  |
| Lisa O'Sullivan       | \$165.00                           | Paralegal        | 2        | N/A  |
| Coy A. Westbrook      | \$0.00 <sup>2</sup>                | Summer Associate | N/A      | N/A  |

21. The hours expended in this matter and the rates charged were and are reasonable and necessary. In particular, the attorneys' fees were billed at or below customary rates. Rates for attorneys varied over the course of this litigation. My own rate for this case is currently \$375.00 per hour, which is significantly lower than my current regular rate. Other attorneys on this matter were also billed at rates lower than their regular rates. Fees for other attorneys vary between \$325.00 and \$375.00 per hour depending on experience level as well as the agreed rate with Saenz at the applicable time. Fees for paralegals vary between \$160.00 and \$265.00 per hour depending on experience level and the agreed rate with Saenz at the applicable time. The fees charged to Saenz reflect work and services actually performed in this case. These rates are reasonable in light of the combined 98.5 years of experience of the professionals involved and the average attorney and paralegal billing rates generally prevailing in San Antonio, Texas. As further discussed herein, these rates and fees are further reasonable and necessary in light of the novelty and difficulty of the questions involved, the complex, high-stakes commercial nature of

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<sup>2</sup> Mr. Westbrook was a summer associate and appears on invoice number 3403782. Saenz was not charged for his work, and Saenz does not seek recovery for such work.

this litigation, as well as in light of Saenz's success in prevailing on Plaintiffs' claims and obtaining a Final Judgment in his favor as to liability.

22. The hours spent and fees incurred in prevailing on Plaintiffs' claims were also reasonable and necessary, and were significant in amount, for several other reasons. First, Saenz expended a significant amount of time preparing two separate Motions to Dismiss in this case in response to hundreds of pages of pleadings and exhibits. Initially, Plaintiffs' Original Complaint and the Original Application were both in excess of thirty-five (35) pages. The Original Complaint contained eight causes of action against Saenz, which required extensive analysis and research related to Saenz's defenses. After Saenz filed the Motion to Dismiss Plaintiffs' Original Complaint and Original Application, Plaintiffs sought leave to file an amended complaint and application under seal. Ultimately, the Court granted the motion for leave. Plaintiffs' First Amended Verified Complaint and First Amended Application are even lengthier than the initial pleadings. The First Amended Verified Complaint is fifty-six (56) pages long and includes nine claims against Saenz, while the First Amended Application is sixty (60) pages long and includes 41 separate exhibits. Saenz then expended significant time and resources preparing the Motion to Dismiss Plaintiffs' First Amended Verified Complaint and Application for Seizure, Temporary Restraining Order, Preliminary Injunction, and Permanent Injunctive Relief. Saenz ultimately prevailed, in large part, on the Motion to Dismiss.

23. Second, Plaintiff Villareal filed a Motion for Sanctions Pursuant to FED. R. CIV. P. 11. The Motion for Sanctions was sixteen (16) pages long with nine (9) separate exhibits. Responding to the Motion for Sanctions required considerable time and resources, as well as a careful analysis of Villareal's accusations. Saenz ultimately prevailed on the Motion for Sanctions.

24. Third, counsel for Saenz spent a considerable amount of time and resources preparing and briefing Saenz's Motion for Judgment on the Pleadings or, in the Alternative, Motion to Dismiss the Claims Asserted by Jonathan Villareal, Individually, as well as Saenz's motion for entry of judgment in this case, Saenz ultimately prevailed on both motions. Finally, Saenz has incurred fees in the preparation of his Motion to Recover Attorneys' Fees.

25. In summary, Saenz has incurred a total of \$165,801.00 in attorneys' fees from June 12, 2020 through April 12, 2022 in connection with successfully defending against Plaintiffs' claims and allegations in this case. True and correct copies of the attorneys' fee bills for the tasks and amounts listed above, with attorney-client privileged information and work product information redacted, are attached hereto as **Exhibit A**. However, as outlined in detail below, Saenz does not seek recovery of the entire amount of fees incurred. Although Saenz contends that the circumstances of this case do not require Saenz to segregate his attorneys' fees, Saenz has included a 50% reduction for time spent working on the Original Answer and Original Counterclaim. Saenz has also excluded all costs incurred during this litigation.

26. In particular, Saenz voluntarily dismissed his Original Counterclaim without prejudice on March 25, 2022 (ECF No. 81).<sup>3</sup> Saenz recognizes that he was not the prevailing party on the Original Counterclaim because there is no prevailing party at this time. As such, Saenz is not seeking to recover the fees incurred for drafting the Original Counterclaim. Saenz incurred a total of \$8,390.00 in connection with drafting the Original Answer and Original Counterclaim. After applying a 50% reduction to twelve (12) time entries that involved billing for the Original Answer and/or the Original Counterclaim, Saenz is only seeking \$4,195.00 of

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<sup>3</sup> However, Saenz expressly reserved all of his rights to later assert any claims, including the counterclaims, against Villareal or ZroBlack in a Texas state district court or another court of competent jurisdiction. ECF No. 81 at 7.

the total amount of fees incurred in connection with the Original Answer and Original Counterclaim. This results in a reduction of \$4,195.00 from the total amount of fees incurred. Each of the 12 time entries that were subject to the 50% reduction are attached hereto as **Exhibit B**.

27. After subtracting 50% of the fees incurred in connection with preparing the Original Answer and Original Counterclaim, the total amount of fees is **\$161,606.00** ( $\$165,801.00 - \$4,195.00 = \$161,606.00$ ). Saenz seeks recovery of this amount from Plaintiffs.

28. In my opinion, the sum of at least \$161,606.00 is: (A) a reasonable amount of attorneys' fees expended in this case for the time period of June 12, 2020 to April 12, 2022 and (B) within the range of usual and customary fees charged in Bexar County, Texas, considering and/or given: (i) the time required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly; (ii) the likelihood that the acceptance of this engagement will preclude other employment by the lawyer; (iii) the fees customarily charged in the locality for similar legal services; (iv) the amount involved and results obtained in the controversy; (v) the time limitations imposed by the client or by the circumstances; (vi) the nature and length of the professional relationship with the client; and (vi) the experience, reputation and ability of the lawyers performing the service.

29. In particular, the hundreds of pages of pleadings and exhibits, the number of claims asserted against Saenz, and the creative briefing by Plaintiffs all demanded a substantial amount of time to evaluate, address, and refute the novel and sometimes difficult issues raised by Plaintiffs in this matter. Additionally, given that: (1) counsel for Saenz maintains a busy docket, (2) counsel for Saenz charges for its legal services by the hour, and (3) counsel for Saenz expended a significant number of hours on this matter over almost two years, this matter

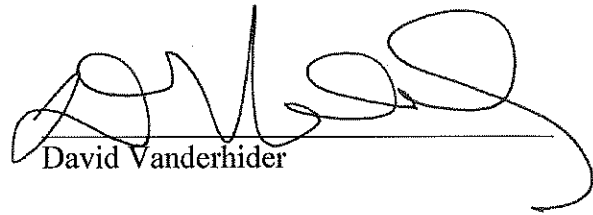
certainly limited and precluded counsel for Saenz from taking on other matters. Further, the fees charged by Dykema in this case were significantly lower than the rates that the same Dykema professionals customarily charge in Bexar County for similar legal services. Additionally, the amount in controversy in this matter was significant, as Plaintiffs sought to recover from Saenz both: (1) \$740,000, and (2) the “loss of several multi-million dollar contracts.” *See* First Amended Verified Complaint at ¶¶ 5, 183. Further, Saenz prevailed in full on all claims and allegations asserted by Plaintiffs by obtaining a dismissal with prejudice of all of Plaintiffs’ claims in this matter. Additionally, due to the proposed injunctive relief and seizure that Plaintiffs sought in this matter, counsel for Saenz faced significant time limitations and was required to quickly evaluate and brief key legal issues that ultimately resulted in Saenz prevailing in this matter. Likewise, in addition to the multitude of significant briefing that this matter required, this case spanned nearly two years and resulted in a lengthy professional relationship between Dykema and Saenz. Finally, Saenz’s counsel has significant experience and requisite ability in performing services on similar matters in Bexar County, including in federal court, in light of the fact that the attorneys and paralegals working on this matter are members of a well-established business litigation firm located in Bexar County and have 98.5 years of combined experience practicing in Bexar County.

30. Thus, given the nature and complexity of this case, the amount in controversy, the amount of work performed, and the success of counsel’s efforts, among other factors, an award of Saenz’s attorneys’ fees incurred from June 12, 2020 through April 12, 2022 in the amount of \$161,606.00, is reasonable, necessary, equitable and just under the circumstances.

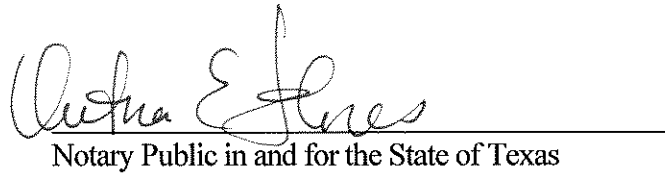
31. Saenz is not seeking recovery of any costs incurred throughout this litigation.

32. Further, affiant sayeth not.

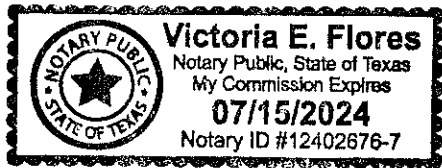
Executed on April 12, 2022

  
David Vanderhider

The foregoing was subscribed, sworn to, and acknowledged before me this 12th day of April, 2022 by David Vanderhider.

  
Notary Public in and for the State of Texas

My Commission Expires:



# Exhibit A



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ



**DUE UPON RECEIPT**

JULY 28, 2020

MATTER #: 120206.000001

INVOICE #: 3339334

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 13,974.50        |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>13,974.50</b> |





JOHN SAENZ

MATTER #: 120206.000001

JULY 28, 2020

INVOICE #: 3339334

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION   | HOURS |
|----------|------|---|-------|
| 06/12/20 | DAV  | BEGIN REVIEWING AND ANALYZING [REDACTED] AND MOTION TO DISMISS.   | 0.30  |
| 06/15/20 | DAV  | ANALYZE PLEADINGS AND DEVELOP [REDACTED]<br>[REDACTED]; ATTEND [REDACTED] AND [REDACTED]<br>WITH [REDACTED]; ANALYZE ADDITIONAL DOCUMENTS AND COORDINATE<br>[REDACTED] WITH [REDACTED]                                  | 2.70  |
| 06/15/20 | DIF1 | (REDUCED CHARGE) REVIEW [REDACTED]  | 0.40  |
| 06/15/20 | RJSU | REVIEW PLEADINGS AND PREPARE [REDACTED]   | 1.60  |
| 06/16/20 | DAV  | (REDUCED CHARGE) REVIEW [REDACTED]; ANALYZE<br>STRATEGY FOR [REDACTED]<br>[REDACTED]  | 0.60  |
| 06/16/20 | RJSU | CONTINUE TO REVIEW PLEADINGS AND ATTACHMENTS; RESEARCH [REDACTED]<br>[REDACTED]   | 1.60  |
| 06/17/20 | DAV  | PREPARE FOR AND ATTEND [REDACTED]<br>WITH [REDACTED] TO [REDACTED]<br>[REDACTED]; EMAIL<br>CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED];<br>REVIEW [REDACTED] FROM [REDACTED] REGARDING [REDACTED]<br>[REDACTED] | 2.60  |
| 06/17/20 | RJSU | CONFERENCE CALL WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]  | 1.70  |
| 06/17/20 | RJSU | RESEARCH [REDACTED] RESEARCH [REDACTED]<br>[REDACTED] RESEARCH [REDACTED]<br>[REDACTED]   | 2.70  |
| 06/18/20 | DAV  | TELEPHONE CALL WITH [REDACTED]<br>[REDACTED] EMAIL CORRESPONDENCE WITH [REDACTED]<br>[REDACTED]; ANALYZE<br>[REDACTED]; COORDINATE WITH<br>[REDACTED] REGARDING [REDACTED].   | 2.60  |
| 06/18/20 | RJSU | BEGIN DRAFTING MOTION TO DISMISS PLAINTIFF'S COMPLAINT (FACTUAL<br>BACKGROUND AND ARGUMENT RE: SCOPE OF RELEASE).   | 4.00  |
| 06/19/20 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING<br>[REDACTED]  | 0.10  |
| 06/20/20 | RJSU | CONTINUE DRAFTING MOTION TO DISMISS PLAINTIFF'S COMPLAINT   | 1.80  |



JOHN SAENZ

MATTER #: 120206.000001

JULY 28, 2020

INVOICE #: 3339334

PAGE 3

| DATE        | ID   | DESCRIPTION   | HOURS       |
|-------------|------|---|-------------|
|             |      | [REDACTED]  |             |
| 06/22/20    | DAV  | REVIEW AND REVISE MOTION TO DISMISS; COORDINATE WITH [REDACTED]<br>REGARDING [REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED]<br>REGARDING [REDACTED] | 1.50        |
| 06/22/20    | RJSU | CONTINUE DRAFTING MOTION TO DISMISS PLAINTIFF'S COMPLAINT<br>[REDACTED] RE: [REDACTED] RE: [REDACTED]   | 3.50        |
| 06/22/20    | RJSU | (REDUCED CHARGE) CONTINUE DRAFTING MOTION TO DISMISS PLAINTIFF'S<br>COMPLAINT (ARGUMENT RE: [REDACTED]<br>[REDACTED])                                 | 3.20        |
| 06/22/20    | RJSU | CONTINUE DRAFTING MOTION TO DISMISS PLAINTIFF'S COMPLAINT<br>(ARGUMENT RE: [REDACTED]<br>[REDACTED])  | 3.60        |
| 06/23/20    | BLC1 | REVISE [REDACTED]   | 0.40        |
| 06/23/20    | DAV  | (REDUCED CHARGE) FINALIZE MOTION TO DISMISS; COORDINATE WITH [REDACTED]<br>[REDACTED] REGARDING [REDACTED]  | 2.60        |
| 06/23/20    | RJSU | FINALIZE [REDACTED]   | 2.60        |
| 06/24/20    | DAV  | ANALYZE [REDACTED]; REVIEW [REDACTED]<br>FROM [REDACTED] AND COORDINATE WITH [REDACTED]   | 0.40        |
| 06/29/20    | RJSU | ANALYZE [REDACTED]  | 0.10        |
| 06/29/20    | DAV  | COORDINATE WITH [REDACTED]; ANALYZE [REDACTED]<br>[REDACTED]; ANALYZE [REDACTED]  | 0.50        |
| TOTAL HOURS |      |   | 41.10       |
| TOTAL       |      |   | \$13,974.50 |



JOHN SAENZ

JULY 28, 2020

MATTER #: 120206.000001

INVOICE #: 3339334

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**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>      |
|-----------|-------------------|--------------|--------------|--------------------|
| DAV       | DAVID VANDERHIDER | 13.90        | 375.00       | 5,212.50           |
| RJSU      | RYAN J. SULLIVAN  | 26.40        | 325.00       | 8,580.00           |
| BLC1      | BARBIE CELAYA     | 0.40         | 250.00       | 100.00             |
| DIF1      | DINA FOSTER       | 0.40         | 205.00       | 82.00              |
|           | <b>TOTAL</b>      | <b>41.10</b> |              | <b>\$13,974.50</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



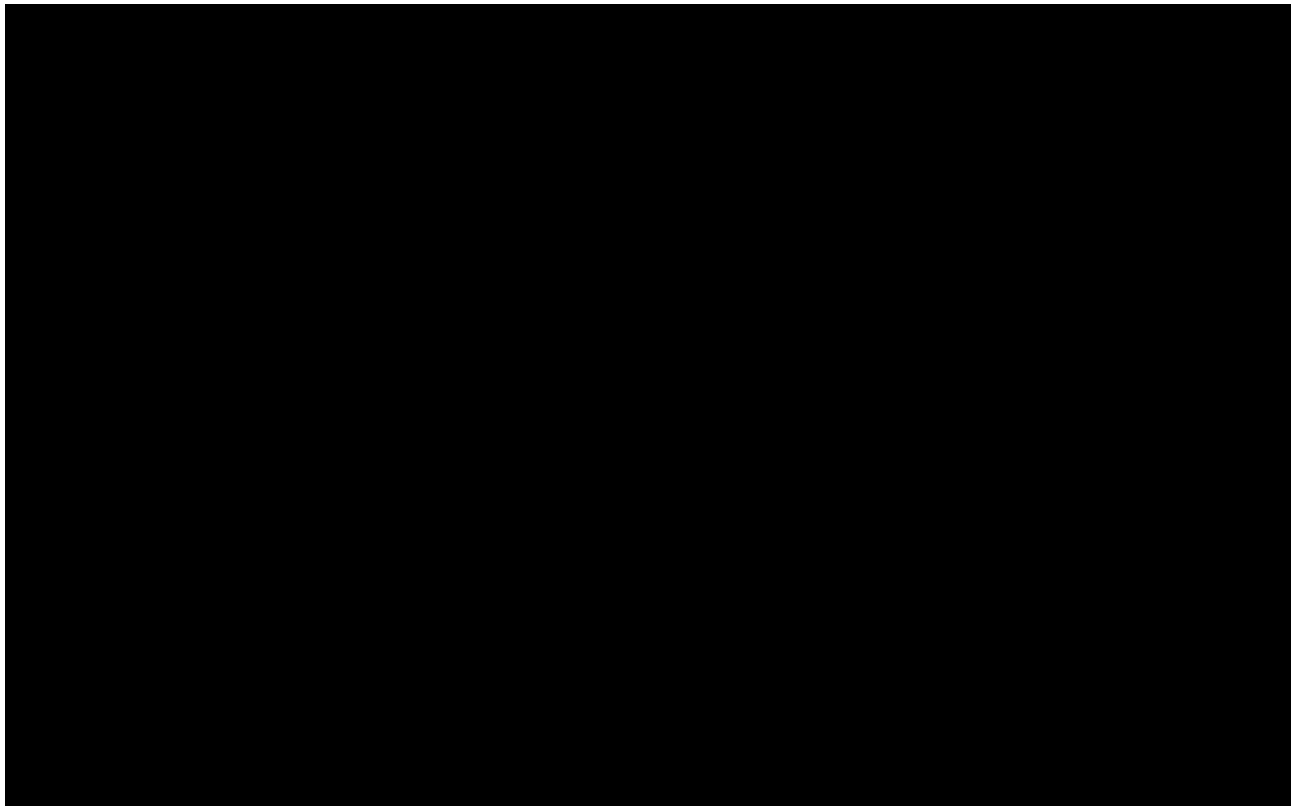
JULY 28, 2020

MATTER #: 120206.000001

INVOICE #: 3339334

|               |    |                  |
|---------------|----|------------------|
| FEES          | \$ | 13,974.50        |
| INVOICE TOTAL | \$ | <b>13,974.50</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ



**DUE UPON RECEIPT**

AUGUST 20, 2020

MATTER #: 120206.000001

INVOICE #: 3343607

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 12,417.50        |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>12,417.50</b> |



JOHN SAENZ

MATTER #: 120206.000001

AUGUST 20, 2020

INVOICE #: 3343607

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION  | HOURS |
|----------|------|--|-------|
| 07/01/20 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.10  |
| 07/06/20 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]; REVIEW INFORMATION REGARDING [REDACTED]                             | 0.20  |
| 07/06/20 | RJSU | REVIEW [REDACTED]  | 0.30  |
| 07/07/20 | BLC1 | COMMUNICATE WITH [REDACTED]  | 0.40  |
| 07/07/20 | DAV  | REVIEW [REDACTED] REGARDING [REDACTED]   | 0.20  |
| 07/08/20 | BLC1 | (NO CHARGE 0.3) CALCULATE [REDACTED] FOR [REDACTED]  | 0.00  |
| 07/08/20 | DAV  | REVIEW [REDACTED] FROM [REDACTED] REGARDING [REDACTED]; ANALYZE PSA AND AMENDMENT TO PSA; EMAIL CORRESPONDENCE WITH [REDACTED] | 1.10  |
| 07/08/20 | DAV  | (NO CHARGE 0.1) REVIEW ORDER REGARDING [REDACTED]  | 0.00  |
| 07/09/20 | DAV  | COORDINATE WITH [REDACTED] REGARDING MOTION TO DISMISS; REVIEW ADDITIONAL INFORMATION FROM [REDACTED]                          | 0.20  |
| 07/10/20 | BLC1 | CALCULATE [REDACTED] FOR [REDACTED]  | 0.40  |
| 07/10/20 | DAV  | REVIEW RULE 26(F) ADVISORY FROM THE COURT.   | 0.10  |
| 07/13/20 | RJSU | REVIEW AND ANALYZE [REDACTED]  | 0.30  |
| 07/13/20 | DAV  | REVIEW AND ANALYZE [REDACTED]  | 0.70  |
| 07/14/20 | RJSU | REVIEW AND ANALYZE [REDACTED] RESEARCH [REDACTED]  | 2.90  |
| 07/14/20 | DAV  | BEGIN REVIEWING RESPONSE TO MOTION TO DISMISS; COORDINATE WITH [REDACTED] REGARDING [REDACTED]                                 | 0.80  |
| 07/15/20 | DAV  | ANALYZE ARGUMENTS AND LEGAL AUTHORITIES IN RESPONSE TO MOTION TO DISMISS; ANALYZE [REDACTED]; PREPARE [REDACTED]               | 4.50  |



JOHN SAENZ

MATTER #: 120206.000001

INVOICE #: 3343607

AUGUST 20, 2020

PAGE 3

| DATE        | ID   | DESCRIPTION   | HOURS       |
|-------------|------|---|-------------|
| 07/16/20    | DAV  | ANALYZE LEGAL AUTHORITIES FOR REPLY BRIEFING.   | 0.70        |
| 07/16/20    | RJSU | PREPARE [REDACTED]  | 0.40        |
| 07/19/20    | RJSU | DRAFT REPLY IN SUPPORT OF MOTION TO DISMISS [REDACTED]<br>[REDACTED]  | 6.00        |
| 07/19/20    | DAV  | ANALYZE LEGAL AUTHORITIES AND EVIDENCE; ANALYZE [REDACTED]<br>[REDACTED]; DRAFT AND REVISE REPLY IN<br>SUPPORT OF MOTION TO DISMISS; COORDINATE WITH [REDACTED] REGARDING<br>[REDACTED] | 4.60        |
| 07/20/20    | DAV  | (REDUCED CHARGE FROM 5.8) ANALYZE [REDACTED]<br>ANALYZE [REDACTED]; DRAFT AND<br>REVISE REPLY IN SUPPORT OF MOTION TO DISMISS.  | 4.80        |
| 07/21/20    | BLC1 | COMMUNICATE WITH [REDACTED] CONCERNING [REDACTED]<br>[REDACTED]   | 0.30        |
| 07/21/20    | DAV  | (REDUCED CHARGE FROM 5.4) DRAFT AND FINALIZE REPLY IN SUPPORT OF<br>MOTION TO DISMISS; COORDINATE WITH [REDACTED] REGARDING [REDACTED]<br>COORDINATE [REDACTED]                         | 5.00        |
| 07/22/20    | DAV  | ANALYZE [REDACTED] S; TELEPHONE<br>CALL WITH [REDACTED]   | 0.80        |
| TOTAL HOURS |      |   | 34.80       |
| TOTAL       |      |   | \$12,417.50 |



JOHN SAENZ

AUGUST 20, 2020

MATTER #: 120206.000001

INVOICE #: 3343607

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**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>      |
|-----------|-------------------|--------------|--------------|--------------------|
| DAV       | DAVID VANDERHIDER | 23.80        | 375.00       | 8,925.00           |
| RJSU      | RYAN J. SULLIVAN  | 9.90         | 325.00       | 3,217.50           |
| BLC1      | BARBIE CELAYA     | 1.10         | 250.00       | 275.00             |
|           | <b>TOTAL</b>      | <b>34.80</b> |              | <b>\$12,417.50</b> |





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



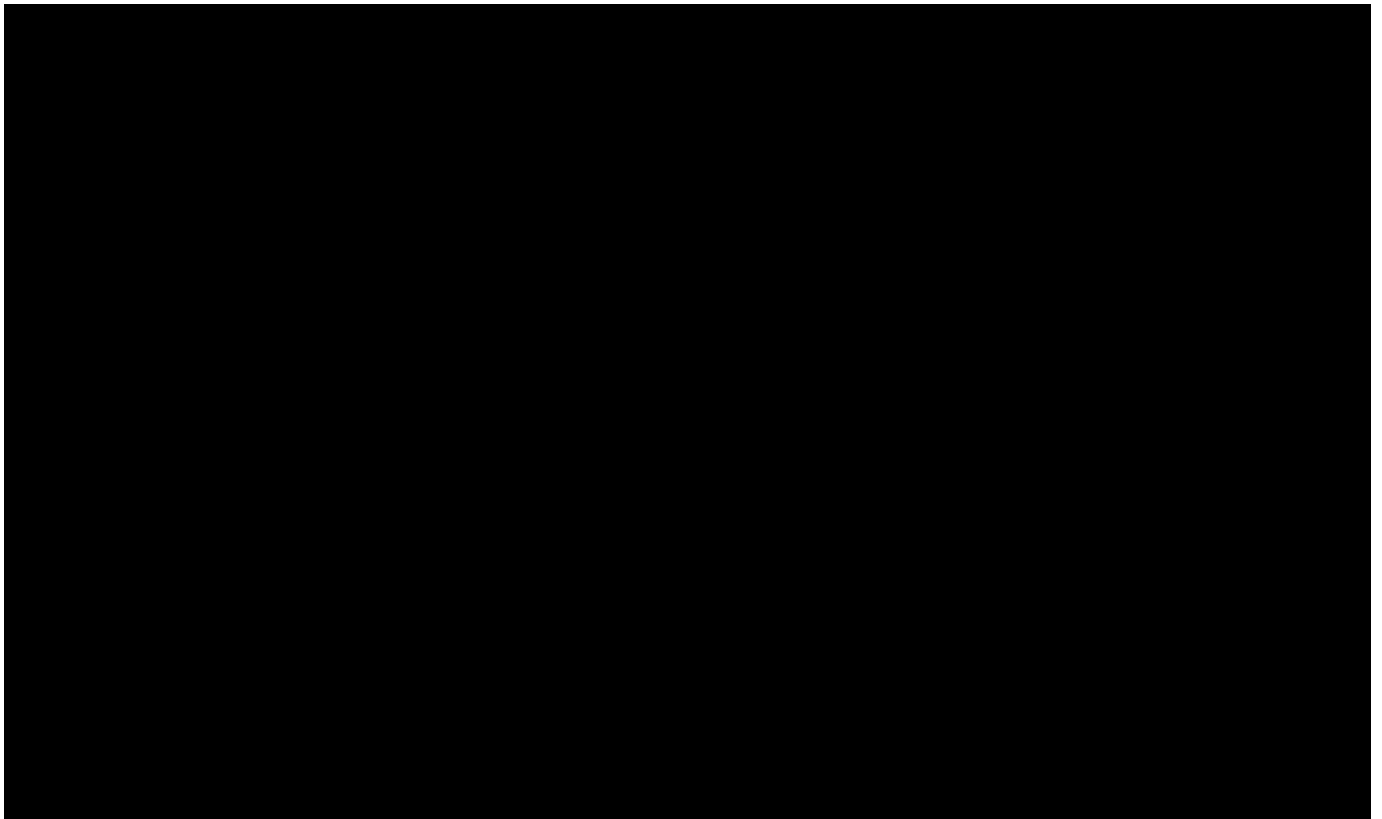
AUGUST 20, 2020

MATTER #: 120206.000001

INVOICE #: 3343607

|               |    |                  |
|---------------|----|------------------|
| FEES          | \$ | 12,417.50        |
| INVOICE TOTAL | \$ | <b>12,417.50</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

SEPTEMBER 25, 2020  
MATTER #: 120206.000001  
INVOICE #: 3349309

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 2,974.50        |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>2,974.50</b> |



JOHN SAENZ

SEPTEMBER 25, 2020

MATTER #: 120206.000001

INVOICE #: 3349309

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT |
|----------|------|---|-------|--------|
| 08/04/20 | DAV  | REVIEW [REDACTED]<br>[REDACTED]; COORDINATE WITH [REDACTED]   | 0.60  | 225.00 |
| 08/04/20 | RJSU | REVIEW AND ANALYZE [REDACTED]<br>[REDACTED]   | 0.60  | 195.00 |
| 08/06/20 | DAV  | (REDUCED CHARGE) EVALUATE [REDACTED]<br>[REDACTED]; ANALYZE [REDACTED]<br>REGARDING [REDACTED]<br>REGARDING [REDACTED]; COORDINATE [REDACTED]         | 1.50  | 562.50 |
| 08/06/20 | MLFR | ANALYZE STRATEGY REGARDING [REDACTED]<br>[REDACTED]   | 0.80  | 332.00 |
| 08/06/20 | RJSU | CORRESPONDENCE WITH ALL COUNSEL RE: RULE 26F<br>CONFERENCE; ANALYZE [REDACTED]<br>[REDACTED] AND DRAFT CORRESPONDENCE TO [REDACTED]<br>RE: [REDACTED] | 1.00  | 325.00 |
| 08/07/20 | RJSU | CALL WITH [REDACTED] RE: [REDACTED]<br>[REDACTED]   | 0.50  | 162.50 |
| 08/07/20 | DAV  | (NO CHARGE) COORDINATE WITH [REDACTED] REGARDING<br>DEFENSE STRATEGY; REVIEW [REDACTED]   | 0.00  | 0.00   |
| 08/10/20 | DAV  | REVIEW [REDACTED]<br>[REDACTED]   | 0.50  | 187.50 |
| 08/11/20 | RJSU | (NO CHARGE) REVIEW AND ANALYZE [REDACTED]<br>[REDACTED]   | 0.00  | 0.00   |
| 08/13/20 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]   | 0.40  | 150.00 |
| 08/13/20 | RJSU | PREPARE FOR AND ATTEND RULE 26F CONFERENCE WITH<br>COUNSEL FOR ALL PARTIES.   | 0.80  | 260.00 |
| 08/19/20 | DAV  | REVISE [REDACTED]; EMAIL CORRESPONDENCE WITH<br>[REDACTED] REGARDING [REDACTED]   | 0.50  | 187.50 |
| 08/19/20 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]   | 0.30  | 112.50 |
| 08/21/20 | DAV  | REVIEW SIGNED SCHEDULING ORDER; EMAIL CORRESPONDENCE<br>WITH [REDACTED] REGARDING [REDACTED]  | 0.30  | 112.50 |
| 08/24/20 | BLC1 | CALENDAR CASE DEADLINES FROM SCHEDULING ORDER   | 0.50  | 125.00 |



JOHN SAENZ

MATTER #: 120206.000001

SEPTEMBER 25, 2020

INVOICE #: 3349309

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| DATE     | ID  | DESCRIPTION       | HOURS | AMOUNT     |
|----------|-----|-------------------|-------|------------|
| 08/24/20 | DAV | REVIEW [REDACTED] | 0.10  | 37.50      |
| TOTAL    |     |                   | 8.40  | \$2,974.50 |



JOHN SAENZ

SEPTEMBER 25, 2020

MATTER #: 120206.000001

INVOICE #: 3349309

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**BILLING SUMMARY**

| ID   | TIMEKEEPER        | HOURS | RATES  | AMOUNT   |
|------|-------------------|-------|--------|----------|
| DAV  | DAVID VANDERHIDER | 4.20  | 375.00 | 1,575.00 |
| RJSU | RYAN J. SULLIVAN  | 2.90  | 325.00 | 942.50   |
| BLC1 | BARBIE CELAYA     | 0.50  | 250.00 | 125.00   |
|      |                   |       |        |          |



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**DUE UPON RECEIPT**

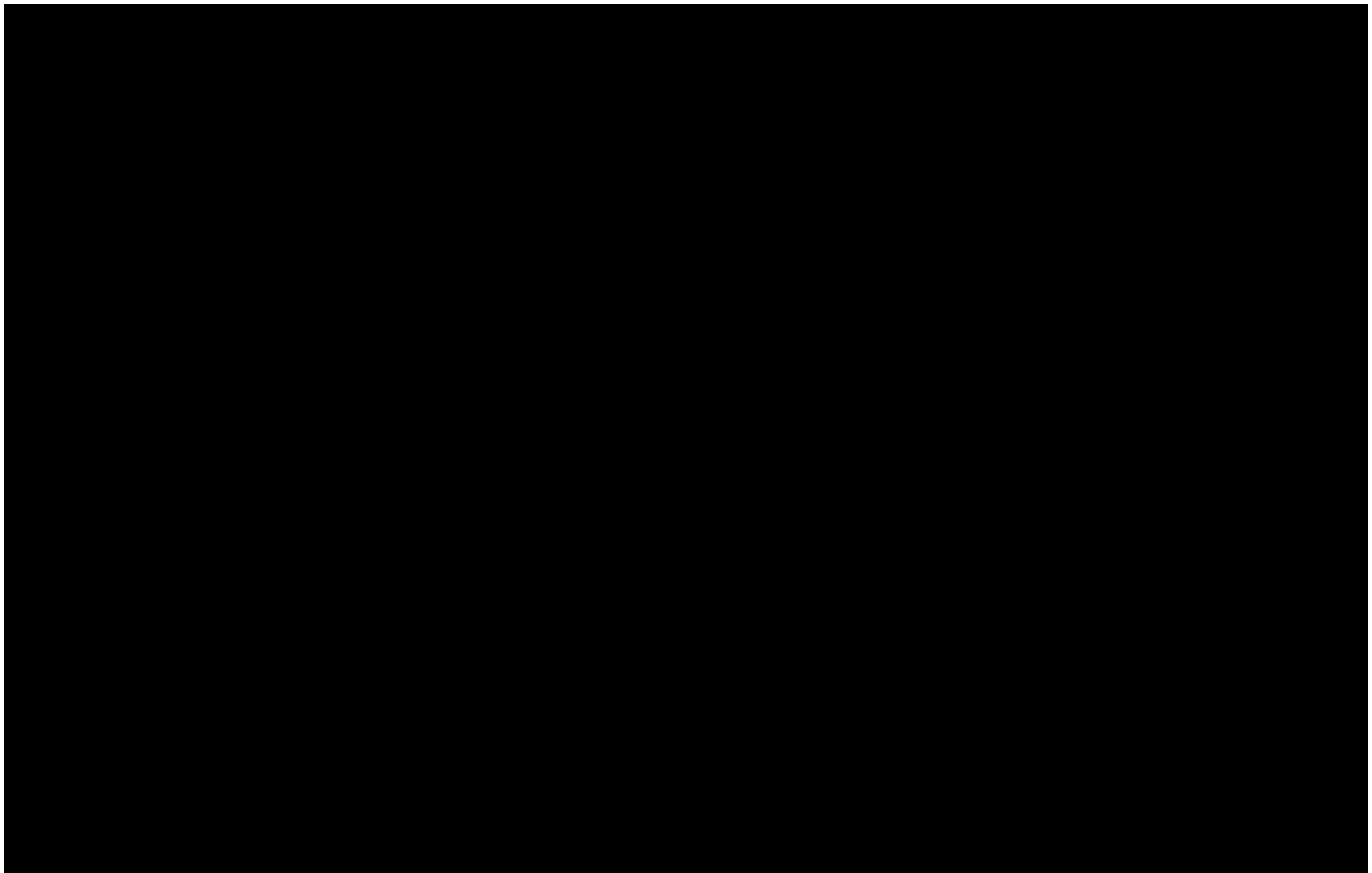
JOHN SAENZ



SEPTEMBER 25, 2020  
MATTER #: 120206.000001  
INVOICE #: 3349309

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 2,974.50        |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>2,974.50</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ



**DUE UPON RECEIPT**

NOVEMBER 18, 2020  
MATTER #: 120206.000001  
INVOICE #: 3360248

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 1,772.50        |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>1,772.50</b> |



JOHN SAENZ

MATTER #: 120206.000001

NOVEMBER 18, 2020

INVOICE #: 3360248

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE         | ID   | DESCRIPTION   | HOURS       | AMOUNT            |
|--------------|------|---|-------------|-------------------|
| 09/30/20     | DAV  | REVIEW [REDACTED] REGARDING STATUS CONFERENCE REQUIRED BY COURT.  | 0.10        | 37.50             |
| 10/08/20     | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]   | 0.20        | 75.00             |
| 10/13/20     | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]   | 0.50        | 187.50            |
| 10/13/20     | RJSU | PREPARE FOR STATUS CONFERENCE.  | 0.30        | 97.50             |
| 10/14/20     | RJSU | (REDUCED CHARGE) ATTEND TELEPHONIC STATUS CONFERENCE.   | 0.70        | 227.50            |
| 10/14/20     | RJSU | PREPARE [REDACTED] FOR [REDACTED]   | 0.30        | 97.50             |
| 10/14/20     | DAV  | ATTEND SCHEDULING CONFERENCE WITH [REDACTED]<br>[REDACTED]; COORDINATE WITH [REDACTED]<br>[REDACTED] REGARDING [REDACTED] | 1.50        | 562.50            |
| 10/16/20     | DAV  | REVIEW [REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.60        | 225.00            |
| 10/22/20     | DAV  | REVIEW [REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.30        | 112.50            |
| 10/27/20     | DAV  | EVALUATE [REDACTED]   | 0.40        | 150.00            |
| <b>TOTAL</b> |      |   | <b>4.90</b> | <b>\$1,772.50</b> |





JOHN SAENZ

NOVEMBER 18, 2020

MATTER #: 120206.000001

INVOICE #: 3360248

PAGE 3

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>     |
|-----------|-------------------|--------------|--------------|-------------------|
| DAV       | DAVID VANDERHIDER | 3.60         | 375.00       | 1,350.00          |
| RJSU      | RYAN J. SULLIVAN  | 1.30         | 325.00       | 422.50            |
|           | <b>TOTAL</b>      | <b>4.90</b>  |              | <b>\$1,772.50</b> |



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**DUE UPON RECEIPT**

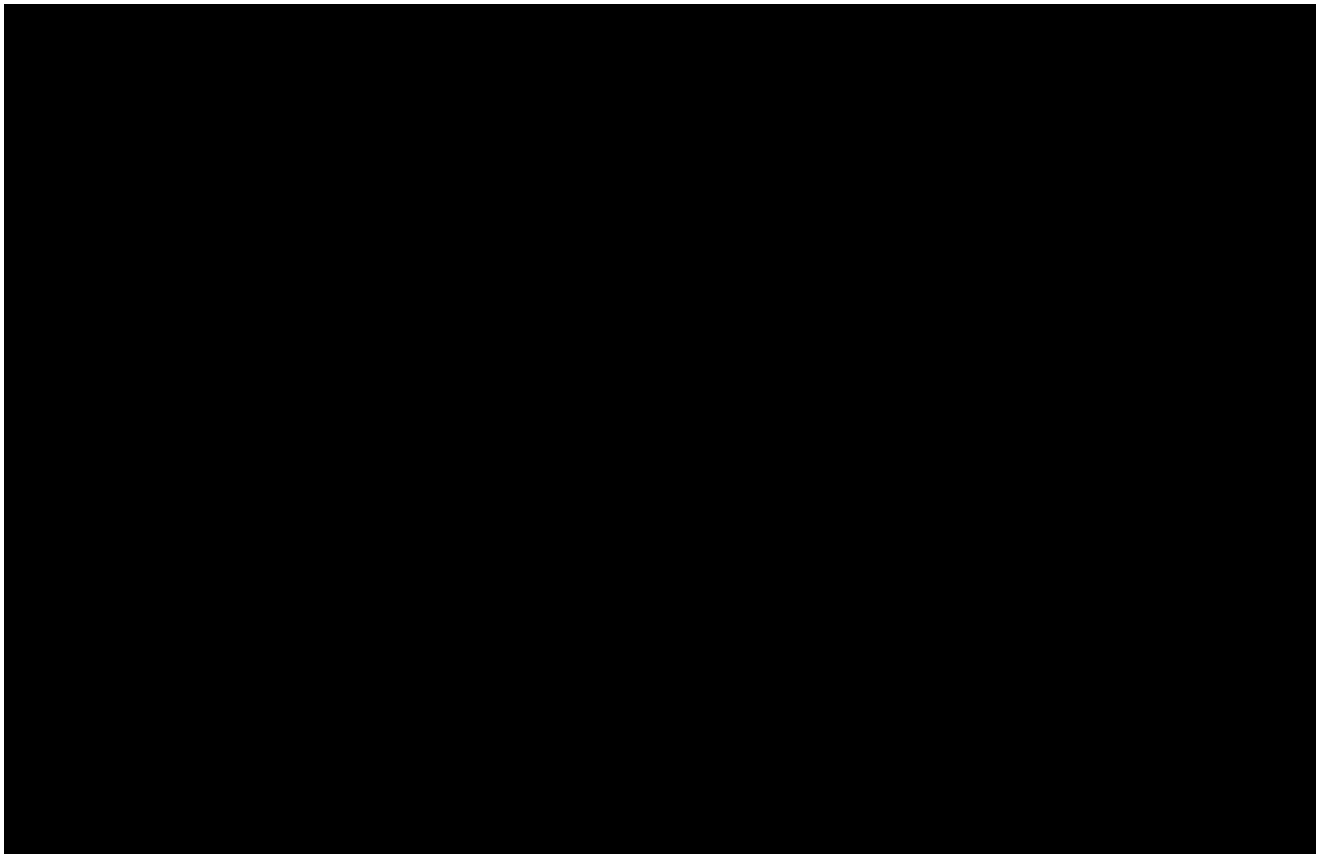
JOHN SAENZ



NOVEMBER 18, 2020  
MATTER #: 120206.000001  
INVOICE #: 3360248

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 1,772.50        |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>1,772.50</b> |

REMITTANCE





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JOHN SAENZ  


**DUE UPON RECEIPT**

DECEMBER 30, 2020  
MATTER #: 120206.000001  
INVOICE #: 3365772

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 8,405.00        |
| DISBURSEMENTS        |           | 67.00           |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>8,472.00</b> |



JOHN SAENZ

DECEMBER 30, 2020

MATTER #: 120206.000001

INVOICE #: 3365772

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT |
|----------|------|---|-------|--------|
| 11/09/20 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]   | 0.40  | 150.00 |
| 11/17/20 | DAV  | REVIEW [REDACTED]; TELEPHONE CALLS FROM [REDACTED]<br>[REDACTED] REGARDING [REDACTED]<br>[REDACTED]; ANALYZE STRATEGY TO RESPOND TO MOTION FOR LEAVE;<br>COORDINATE WITH [REDACTED] | 0.90  | 337.50 |
| 11/17/20 | DAV  | TELEPHONE CALL WITH [REDACTED]<br>[REDACTED]  | 0.30  | 112.50 |
| 11/18/20 | DAV  | ANALYZE PROPOSED AMENDED COMPLAINT AND PROPOSED<br>AMENDED APPLICATION FOR INJUNCTIVE RELIEF; BEGIN<br>ANALYZING [REDACTED]   | 2.20  | 825.00 |
| 11/18/20 | DAV  | COORDINATE WITH [REDACTED] AND<br>[REDACTED] REGARDING [REDACTED]; ANALYZE [REDACTED]<br>[REDACTED]   | 0.90  | 337.50 |
| 11/19/20 | DAV  | DRAFT RESPONSE TO PLAINTIFF'S MOTION FOR EXTENSION OF<br>TIME TO INCLUDE FACTS AND PROCEDURAL HISTORY THAT<br>PLAINTIFF OMITTED.  | 1.90  | 712.50 |
| 11/19/20 | DAV  | ANALYZE [REDACTED]<br>[REDACTED]  | 1.70  | 637.50 |
| 11/19/20 | DAV  | (REDUCED CHARGE) COORDINATE WITH [REDACTED] REGARDING<br>[REDACTED]<br>EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 1.40  | 525.00 |
| 11/19/20 | DARA | REVIEW/ANALYZE AND TAKE NOTES ON [REDACTED]<br>[REDACTED]<br>TELEPHONE CONFERENCE WITH [REDACTED]<br>REGARDING [REDACTED]   | 1.40  | 455.00 |
| 11/19/20 | DAV  | REVIEW INFORMATION REGARDING [REDACTED]<br>[REDACTED]   | 0.20  | 75.00  |
| 11/19/20 | MLFR | ANALYZE GROUNDS FOR RESPONSE TO REQUEST TO AMEND<br>PLEADINGS, FOR EXTENSION OF TIME, AND TO SEAL PLEADINGS.  | 0.50  | 187.50 |
| 11/20/20 | MLFR | REVIEW AND REVISE RESPONSE TO MOTION FOR EXTENSION OF<br>TIME TO FILE AMENDED PLEADINGS.  | 0.80  | 300.00 |
| 11/20/20 | DAV  | DRAFT RESPONSE TO PLAINTIFF'S MOTION FOR EXTENSION OF<br>TIME TO ADDRESS PROCEDURAL HISTORY, SEALING ISSUES, AND<br>RELIEF REQUESTED; DRAFT [REDACTED] COORDINATE WITH              | 2.40  | 900.00 |



JOHN SAENZ

MATTER #: 120206.000001

INVOICE #: 3365772

DECEMBER 30, 2020

PAGE 3

| DATE         | ID   | DESCRIPTION  | HOURS        | AMOUNT            |
|--------------|------|--|--------------|-------------------|
|              |      | [REDACTED]   |              |                   |
| 11/20/20     | DAV  | ANALYZE AND DEVELOP [REDACTED]<br>[REDACTED]   | 0.60         | 225.00            |
| 11/20/20     | DAV  | COORDINATE [REDACTED]<br>[REDACTED]; COORDINATE WITH [REDACTED]  | 1.30         | 487.50            |
| 11/24/20     | DAV  | COORDINATE WITH [REDACTED]   | 0.10         | 37.50             |
| 11/25/20     | DAV  | COORDINATE [REDACTED]  | 0.20         | 75.00             |
| 11/30/20     | DAV  | REVIEW [REDACTED]; TELEPHONE CALL<br>AND EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING<br>[REDACTED]  | 0.80         | 300.00            |
| 11/30/20     | DAV  | TELEPHONE CALLS WITH [REDACTED] AND<br>[REDACTED]; REVIEW ORDER FROM COURT REGARDING<br>TIMING OF AMENDED PLEADINGS BY J. VILLAREAL.   | 0.70         | 262.50            |
| 11/30/20     | DARA | (REDUCED CHARGE FROM 5.4) REVIEW/ANALYZE COURT RULINGS<br>ON MOTION FOR LEAVE TO FILE AMENDED COMPLAINT; DISCUSS<br>[REDACTED] WITH [REDACTED]; REVIEW/ANALYZE AND<br>TAKE NOTES ON [REDACTED]<br>[REDACTED]; BEGIN DRAFTING<br>MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT. | 4.50         | 1,462.50          |
| <b>TOTAL</b> |      |  | <b>23.20</b> | <b>\$8,405.00</b> |



JOHN SAENZ

DECEMBER 30, 2020

MATTER #: 120206.000001

INVOICE #: 3365772

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**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>     |
|-----------|-------------------|--------------|--------------|-------------------|
| MLFR      | MELANIE FRY       | 1.30         | 375.00       | 487.50            |
| DAV       | DAVID VANDERHIDER | 16.00        | 375.00       | 6,000.00          |
| DARA      | DANIEL A. RAY     | 5.90         | 325.00       | 1,917.50          |
|           | <b>TOTAL</b>      | <b>23.20</b> |              | <b>\$8,405.00</b> |



JOHN SAENZ

DECEMBER 30, 2020

MATTER #: 120206.000001

INVOICE #: 3365772

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**DISBURSEMENTS**

| DATE | DESCRIPTION                | AMOUNT       |
|------|----------------------------|--------------|
|      | PRINTING EXPENSES          | 67.00        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>67.00</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

JANUARY 26, 2021  
MATTER #: 120206.000001  
INVOICE #: 3372686

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 12,235.00        |
| DISBURSEMENTS        |           | 415.40           |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>12,650.40</b> |





JOHN SAENZ

JANUARY 26, 2021

MATTER #: 120206.000001

INVOICE #: 3372686

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION  | HOURS | AMOUNT   |
|----------|------|--|-------|----------|
| 12/01/20 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]  | 0.20  | 75.00    |
| 12/01/20 | DAV  | ANALYZE NEW ALLEGATIONS AND STRATEGY TO RESPOND TO SAME.   | 1.90  | 712.50   |
| 12/01/20 | DARA | (NO CHARGE) DISCUSS [REDACTED] WITH [REDACTED]   | 0.00  | 0.00     |
| 12/02/20 | DAV  | (REDUCED CHARGE): EXTENDED CONFERENCE WITH [REDACTED] REGARDING [REDACTED]   | 1.80  | 675.00   |
| 12/02/20 | DAV  | ANALYZE PLEADINGS AND DEVELOP STRATEGY FOR RESPONSE.   | 0.80  | 300.00   |
| 12/02/20 | DARA | EXTENDED CONFERENCE CALL WITH [REDACTED] REGARDING [REDACTED] DISCUSS [REDACTED] WITH [REDACTED]   | 2.40  | 780.00   |
| 12/03/20 | DAV  | TELEPHONE CALLS AND EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.20  | 75.00    |
| 12/03/20 | DAV  | MULTIPLE EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING NEW FILINGS, SERVICE OF SAME, AND SEALING ISSUES.                                  | 0.50  | 187.50   |
| 12/03/20 | DAV  | (REDUCED CHARGE) ANALYZE MOTION FOR LEAVE TO FILE UNDER SEAL AND MEMORANDUM SUPPORTING SAME; DEVELOP [REDACTED]; EMAIL CORRESPONDENCE [REDACTED] | 0.90  | 337.50   |
| 12/03/20 | DAV  | REVIEW [REDACTED] FROM [REDACTED] REGARDING [REDACTED]   | 0.30  | 112.50   |
| 12/03/20 | DARA | REVIEW/ANALYZE [REDACTED]; DISCUSS THE SAME WITH [REDACTED]  | 0.50  | 162.50   |
| 12/04/20 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.10  | 37.50    |
| 12/07/20 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED]   | 0.30  | 112.50   |
| 12/07/20 | DARA | DRAFT/REVISE MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT AND APPLICATION; REVIEW/ANALYZE [REDACTED]                                    | 3.20  | 1,040.00 |



JOHN SAENZ

MATTER #: 120206.000001

INVOICE #: 3372686

JANUARY 26, 2021

PAGE 3

| DATE     | ID   | DESCRIPTION  | HOURS | AMOUNT   |
|----------|------|--|-------|----------|
| 12/08/20 | DAV  | ANALYZE [REDACTED]<br>DRAFT RESPONSE TO MOTION FOR LEAVE TO FILE UNDER SEAL;<br>COORDINATE WITH [REDACTED] REGARDING [REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED].   | 2.90  | 1,087.50 |
| 12/08/20 | DAV  | REVIEW [REDACTED] REGARDING [REDACTED]<br>[REDACTED]; COORDINATE [REDACTED].   | 0.50  | 187.50   |
| 12/08/20 | DARA | REVIEW/ANALYZE [REDACTED]<br>[REDACTED]; DISCUSS [REDACTED] WITH [REDACTED]<br>REVIEW/ANALYZE RESPONSE TO PLAINTIFF'S MOTION TO SEAL;<br>DRAFT/REVISE UPDATED VERSION OF MOTION TO DISMISS<br>PLAINTIFF'S FIRST AMENDED COMPLAINT AND APPLICATION;<br>COMMUNICATE REGARDING [REDACTED] WITH [REDACTED]<br>[REDACTED] | 6.70  | 2,177.50 |
| 12/09/20 | BLC1 | ASSIST WITH [REDACTED]<br>[REDACTED]   | 0.40  | 100.00   |
| 12/09/20 | DAV  | (REDUCED CHARGE) DRAFT AND FINALIZE RESPONSE TO<br>PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL; DRAFT<br>[REDACTED] COORDINATE [REDACTED]  | 0.90  | 337.50   |
| 12/09/20 | DAV  | TELEPHONE CALL WITH [REDACTED]<br>REGARDING [REDACTED] EMAIL CORRESPONDENCE WITH<br>OPPOSING COUNSEL REGARDING LEAVE TO FILE UNDER SEAL VS.<br>LEAVE TO FILE REDACTED COPIES.  | 0.40  | 150.00   |
| 12/11/20 | DAV  | TELEPHONE CALL TO [REDACTED] REGARDING [REDACTED]<br>[REDACTED] COORDINATE WITH [REDACTED]   | 0.60  | 225.00   |
| 12/14/20 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]; COORDINATE<br>WITH [REDACTED]   | 0.30  | 112.50   |
| 12/16/20 | DAV  | COORDINATE WITH [REDACTED] AND [REDACTED]<br>REGARDING [REDACTED]; REVIEW REPLY IN SUPPORT OF MOTION<br>FOR LEAVE FILED BY J. VILLAREAL.   | 0.60  | 225.00   |
| 12/16/20 | DAV  | REVIEW PLAINTIFF'S MOTION FOR LEAVE TO FILE REDACTED<br>COPIES.  | 0.50  | 187.50   |
| 12/16/20 | DAV  | REVIEW [REDACTED]<br>[REDACTED]  | 0.40  | 150.00   |



JOHN SAENZ

MATTER #: 120206.000001

INVOICE #: 3372686

JANUARY 26, 2021

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| DATE         | ID   | DESCRIPTION  | HOURS        | AMOUNT             |
|--------------|------|--|--------------|--------------------|
| 12/17/20     | DAV  | REVIEW [REDACTED]  | 0.50         | 187.50             |
| 12/17/20     | DAV  | PREPARE FOR AND ATTEND MEETING WITH [REDACTED]; COORDINATE [REDACTED]  | 1.10         | 412.50             |
| 12/18/20     | DARA | DISCUSS [REDACTED] AND [REDACTED] WITH [REDACTED] REVIEW/ANALYZE AND TAKE NOTES ON [REDACTED]  | 0.90         | 292.50             |
| 12/22/20     | DARA | REVIEW/ANALYZE REDACTIONS TO PLAINTIFF'S LATEST VERSION OF FIRST AMENDED COMPLAINT (AND EXHIBITS THERETO) AND DISCUSS [REDACTED] WITH [REDACTED]   | 0.90         | 292.50             |
| 12/22/20     | DAV  | (NO CHARGE) COORDINATE WITH [REDACTED] REGARDING [REDACTED]  | 0.00         | 0.00               |
| 12/23/20     | DAV  | TELEPHONE CALL TO [REDACTED] REGARDING [REDACTED]  | 0.10         | 37.50              |
| 12/28/20     | DAV  | TELEPHONE CALL WITH [REDACTED] REGARDING [REDACTED]  | 0.20         | 75.00              |
| 12/29/20     | DAV  | REVIEW CLIENT DOCUMENTS.   | 0.30         | 112.50             |
| 12/30/20     | DAV  | PREPARE FOR AND ATTEND [REDACTED] WITH [REDACTED] ANALYZE [REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED]   | 1.20         | 450.00             |
| 12/30/20     | DARA | TELEPHONE CONFERENCE WITH [REDACTED]; FOLLOW-UP CALL WITH [REDACTED]   | 0.90         | 292.50             |
| 12/31/20     | DARA | REVIEW/ANALYZE [REDACTED]; REVIEW/ANALYZE PLAINTIFF'S APPLICATION REGARDING REFERENCES TO PROPRIETARY INFORMATION AND CODE STORED ON LAPTOP; DRAFT [REDACTED] AND COMMUNICATE REGARDING [REDACTED] WITH [REDACTED] | 1.30         | 422.50             |
| 12/31/20     | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]  | 0.30         | 112.50             |
| <b>TOTAL</b> |      |  | <b>35.00</b> | <b>\$12,235.00</b> |



JOHN SAENZ

JANUARY 26, 2021

MATTER #: 120206.000001

INVOICE #: 3372686

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**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>      |
|-----------|-------------------|--------------|--------------|--------------------|
| DAV       | DAVID VANDERHIDER | 17.80        | 375.00       | 6,675.00           |
| DARA      | DANIEL A. RAY     | 16.80        | 325.00       | 5,460.00           |
| BLC1      | BARBIE CELAYA     | 0.40         | 250.00       | 100.00             |
|           | <b>TOTAL</b>      | <b>35.00</b> |              | <b>\$12,235.00</b> |



JOHN SAENZ

JANUARY 26, 2021

MATTER #: 120206.000001

INVOICE #: 3372686

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**DISBURSEMENTS**

| DATE | DESCRIPTION                | AMOUNT        |
|------|----------------------------|---------------|
|      | PHOTOCOPIES                | 131.80        |
|      | PRINTING EXPENSES          | 283.40        |
|      | SCANNING                   | 0.20          |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>415.40</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



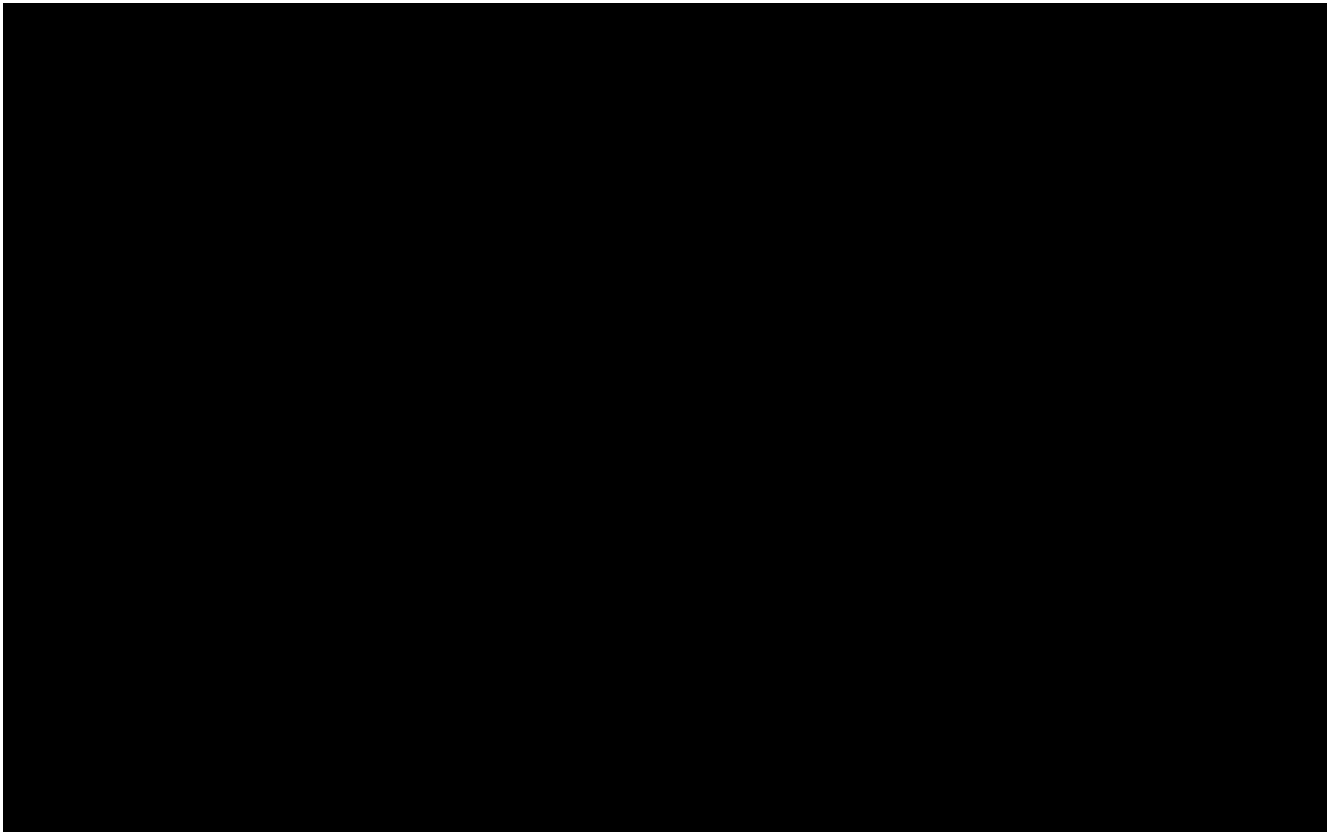
JANUARY 26, 2021

MATTER #: 120206.000001

INVOICE #: 3372686

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 12,235.00        |
| DISBURSEMENTS        |           | 415.40           |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>12,650.40</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

MARCH 5, 2021  
MATTER #: 120206.000001  
INVOICE #: 3379891

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 15,623.50        |
| DISBURSEMENTS        |           | 73.20            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>15,696.70</b> |



JOHN SAENZ

MATTER #: 120206.000001

MARCH 5, 2021

INVOICE #: 3379891

PAGE 2

## RE: ZROBLACK CONTRACT DISPUTE

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT |
|----------|------|---|-------|--------|
| 01/06/21 | DARA | (REDUCED CHARGE FROM 1.9) EXTENDED CONFERENCE CALL WITH [REDACTED]; FOLLOW-UP COMMUNICATION WITH [REDACTED] REGARDING [REDACTED]  | 1.50  | 487.50 |
| 01/06/21 | DAV  | EVALUATE [REDACTED]   | 0.40  | 150.00 |
| 01/06/21 | DAV  | (REDUCED CHARGE FROM 1.3) EXTENDED CONFERENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.90  | 337.50 |
| 01/11/21 | DARA | DRAFT LETTER TO OPPOSING COUNSEL REGARDING POTENTIAL RESOLUTION; DISCUSS THE SAME WITH [REDACTED]   | 1.20  | 390.00 |
| 01/11/21 | RJSU | (NO CHARGE) REVIEW PLAINTIFF'S PLEADINGS RE: FILING UNDER SEAL.   | 0.00  | 0.00   |
| 01/11/21 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED].  | 0.20  | 75.00  |
| 01/12/21 | DAV  | DRAFT [REDACTED] EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 1.20  | 450.00 |
| 01/12/21 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]; REVISE [REDACTED]  | 0.50  | 187.50 |
| 01/13/21 | DAV  | FINALIZE [REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING SAME.   | 0.40  | 150.00 |
| 01/14/21 | RJSU | (NO CHARGE) REVIEW [REDACTED]   | 0.00  | 0.00   |
| 01/14/21 | DARA | (NO CHARGE) DISCUSS [REDACTED] WITH [REDACTED].   | 0.00  | 0.00   |
| 01/15/21 | RJSU | (NO CHARGE) REVIEW TEXT ORDERS FROM MAGISTRATE JUDGE.   | 0.00  | 0.00   |
| 01/15/21 | DARA | DISCUSS [REDACTED] WITH [REDACTED]  | 0.50  | 162.50 |
| 01/15/21 | DAV  | REVIEW ORDERS ON PENDING MOTIONS RELATED TO TIMING AND SUBSTANCE OF NEW FILINGS; COORDINATE WITH [REDACTED]; EMAIL CORRESPONDENCE FROM [REDACTED] EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED] | 1.30  | 487.50 |
| 01/18/21 | DARA | DISCUSS CASE STRATEGY WITH [REDACTED]   | 0.30  | 97.50  |





JOHN SAENZ

MATTER #: 120206.000001

INVOICE #: 3379891

MARCH 5, 2021

PAGE 3

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT |
|----------|------|---|-------|--------|
| 01/18/21 | DAV  | PREPARE [REDACTED]  | 0.40  | 150.00 |
| 01/19/21 | DAV  | TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]; EMAIL CORRESPONDENCE REGARDING [REDACTED]; EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING NEW FILINGS.   | 1.10  | 412.50 |
| 01/19/21 | DARA | TELEPHONE CONFERENCE WITH [REDACTED] AND [REDACTED] REGARDING [REDACTED] EMAIL CORRESPONDENCE TO [REDACTED] REGARDING [REDACTED]  | 0.90  | 292.50 |
| 01/19/21 | DAV  | TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]   | 0.30  | 112.50 |
| 01/20/21 | DARA | REVIEW/ANALYZE [REDACTED]   | 0.30  | 97.50  |
| 01/21/21 | DARA | REVIEW/ANALYZE AUTHORITIES REGARDING APPLICATIONS FOR INJUNCTIVE RELIEF; DISCUSS [REDACTED] WITH [REDACTED]   | 0.60  | 195.00 |
| 01/21/21 | DAV  | REVIEW ORDERS AND UNREDACTED PLEADINGS; REVIEW AND COMMENT ON [REDACTED] REGARDING [REDACTED]   | 0.70  | 262.50 |
| 01/21/21 | DAV  | TELEPHONE CALL WITH OPPOSING COUNSEL REGARDING SETTLEMENT OFFER, RESPONSIVE PLEADINGS, AND DEADLINE FOR SAME; REVIEW [REDACTED] FROM [REDACTED] EMAIL CORRESPONDENCE WITH ALL COUNSEL REGARDING SAME; COORDINATE WITH [REDACTED] REGARDING [REDACTED]                   | 1.70  | 637.50 |
| 01/21/21 | DAV  | WORK ON [REDACTED]  | 0.70  | 262.50 |
| 01/22/21 | DARA | TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]; COORDINATE CONFERENCE CALL WITH [REDACTED] DRAFT [REDACTED] AND COMMUNICATE WITH [REDACTED] REGARDING [REDACTED]; REVIEW/ANALYZE MOTION FOR LEAVE TO EXCEED PAGE LIMITS AND MOTION FOR ENTRY OF STIPULATION. | 1.20  | 390.00 |
| 01/22/21 | DAV  | REVIEW NEW MOTION TO DISMISS.   | 0.30  | 112.50 |
| 01/22/21 | DAV  | PREPARE [REDACTED]  | 0.70  | 262.50 |
| 01/22/21 | DAV  | REVISE [REDACTED]   | 0.60  | 225.00 |
| 01/25/21 | BLC1 | CALCULATE THE DEADLINES STEMMING FROM THE COURT'S ORDER GRANTING EXTENSION OF TIME ON RESPONSES TO FIRST  | 0.40  | 106.00 |



JOHN SAENZ

MATTER #: 120206.000001

MARCH 5, 2021

INVOICE #: 3379891

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| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT   |
|----------|------|---|-------|----------|
|          |      | AMENDED COMPLAINT AND FIRST AMENDED APPLICATION FOR SEIZURE   |       |          |
| 01/25/21 | DARA | DRAFT/REVISE [REDACTED]; TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]; FOLLOW-UP EMAIL CORRESPONDENCE REGARDING THE SAME.  | 1.10  | 357.50   |
| 01/25/21 | DAV  | ANALYZE [REDACTED] PREPARE FOR AND ATTEND [REDACTED]  | 0.90  | 337.50   |
| 01/26/21 | DARA | REVIEW/ANALYZE CASE LAW AND SECONDARY SOURCES REGARDING [REDACTED]  | 1.20  | 390.00   |
| 01/26/21 | DAV  | DRAFT SECOND MOTION TO DISMISS BASED ON NEW ALLEGATIONS.  | 0.90  | 337.50   |
| 01/27/21 | DARA | REVIEW/ANALYZE CASE LAW REGARDING MISAPPROPRIATION OF TRADE SECRETS BY CURRENT OFFICER OF COMPANY; REVIEW/ANALYZE PLAINTIFFS' EXHIBITS [REDACTED] DISCUSS THE FOREGOING WITH [REDACTED]   | 1.10  | 357.50   |
| 01/27/21 | DAV  | (REDUCED CHARGE): ANALYZE LEGAL AUTHORITIES, ALLEGATIONS, AND STRATEGY FOR MOTION TO DISMISS; DRAFT MOTION TO DISMISS; EVALUATE [REDACTED]  | 7.80  | 2,925.00 |
| 01/28/21 | DAV  | DRAFT [REDACTED]; DRAFT [REDACTED]; TELEPHONE CALL TO [REDACTED] REGARDING [REDACTED]   | 3.70  | 1,387.50 |
| 01/28/21 | DARA | DRAFT/REVISE AND FINALIZE INITIAL DRAFT OF MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT AND FIRST AMENDED APPLICATION, INCLUDING REVIEW OF CASE LAW AND SECONDARY SOURCES IN SUPPORT OF THE SAME; DRAFT/REVISE [REDACTED]; REVIEW/ANALYZE [REDACTED]; COMMUNICATE WITH [REDACTED] REGARDING [REDACTED] | 5.80  | 1,885.00 |
| 01/29/21 | DARA | COMMUNICATE WITH [REDACTED] REGARDING [REDACTED] COMMUNICATE WITH [REDACTED] REGARDING [REDACTED]   | 0.20  | 65.00    |
| 01/29/21 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]   | 0.30  | 112.50   |
| 01/31/21 | DAV  | REVISE MOTION TO DISMISS; EMAIL CORRESPONDENCE WITH [REDACTED]  | 2.60  | 975.00   |



JOHN SAENZ

MATTER #: 120206.000001

MARCH 5, 2021

INVOICE #: 3379891

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| DATE  | ID | DESCRIPTION     | HOURS | AMOUNT      |
|-------|----|-----------------|-------|-------------|
|       |    | REGARDING SAME. |       |             |
| TOTAL |    |                 | 43.90 | \$15,623.50 |



JOHN SAENZ

MARCH 5, 2021

MATTER #: 120206.000001

INVOICE #: 3379891

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**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>      |
|-----------|-------------------|--------------|--------------|--------------------|
| DAV       | DAVID VANDERHIDER | 27.60        | 375.00       | 10,350.00          |
| DARA      | DANIEL A. RAY     | 15.90        | 325.00       | 5,167.50           |
| RJSU      | RYAN J. SULLIVAN  | 0.00         | 0.00         | 0.00               |
| BLC1      | BARBIE CELAYA     | 0.40         | 265.00       | 106.00             |
|           | <b>TOTAL</b>      | <b>43.90</b> |              | <b>\$15,623.50</b> |



JOHN SAENZ

MARCH 5, 2021

MATTER #: 120206.000001

INVOICE #: 3379891

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**DISBURSEMENTS**

| DATE | DESCRIPTION                | AMOUNT       |
|------|----------------------------|--------------|
|      | PRINTING EXPENSES          | 73.20        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>73.20</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



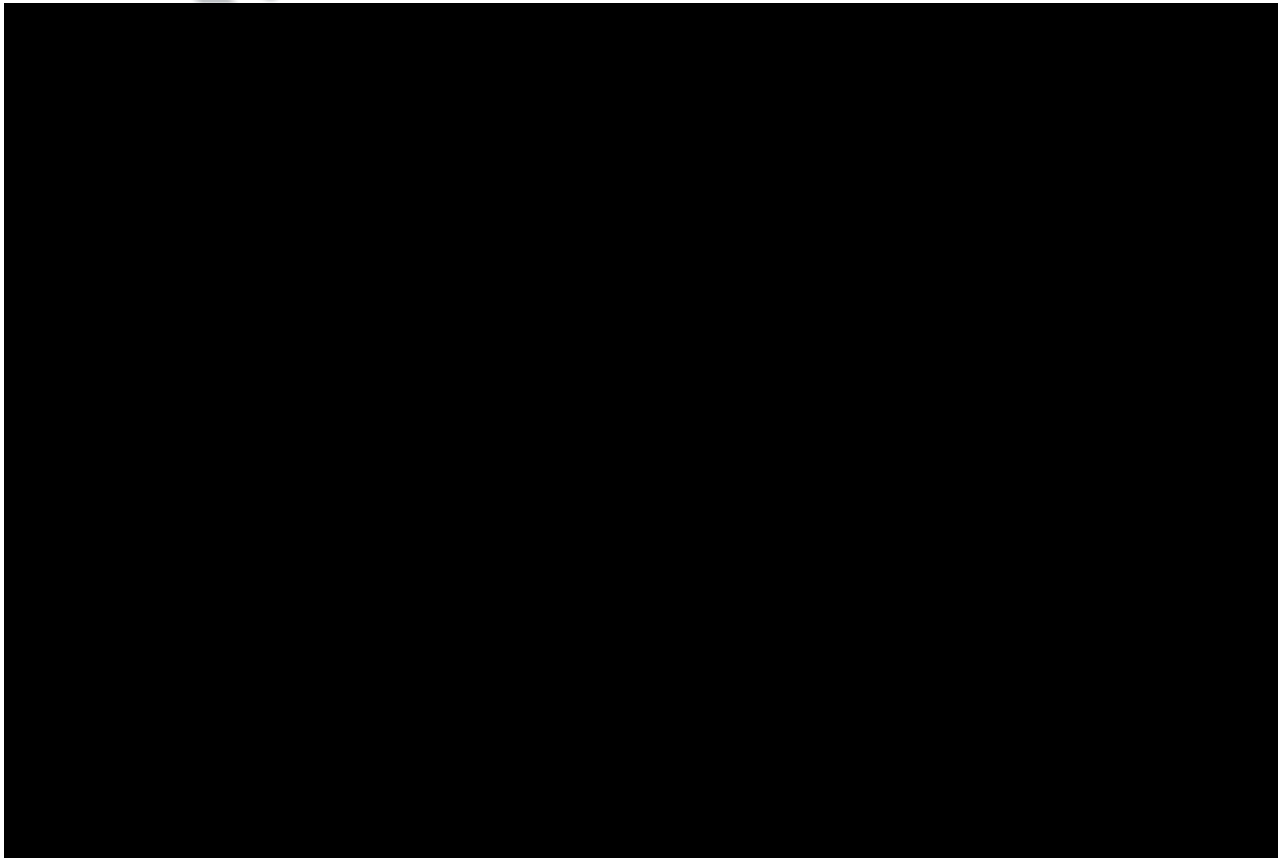
MARCH 5, 2021

MATTER #: 120206.000001

INVOICE #: 3379891

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 15,623.50        |
| DISBURSEMENTS        |           | 73.20            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>15,696.70</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

MARCH 25, 2021  
MATTER #: 120206.000001  
INVOICE #: 3383675

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 11,308.00        |
| DISBURSEMENTS        |           | 28.40            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>11,336.40</b> |



JOHN SAENZ

MATTER #: 120206.000001

MARCH 25, 2021

INVOICE #: 3383675

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION  | HOURS | AMOUNT   |
|----------|------|--|-------|----------|
| 02/01/21 | DARA | DRAFT RESPONSE TO PLAINTIFF'S APPLICATION FOR INJUNCTIVE RELIEF; REVIEW/ANALYZE [REDACTED]; DISCUSS [REDACTED] WITH [REDACTED]; RECEIVE AND REVIEW AFFIDAVIT OF STEVEN BRODERHAUSEN.   | 5.20  | 1,690.00 |
| 02/02/21 | DAV  | (REDUCED CHARGE FROM 3.2) ANALYZE AUTHORITIES REGARDING [REDACTED]; DRAFT RESPONSE TO APPLICATION FOR INJUNCTIVE RELIEF; REVISE [REDACTED]; COORDINATE WITH [REDACTED] REGARDING [REDACTED]  | 2.50  | 937.50   |
| 02/02/21 | DARA | TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.40  | 130.00   |
| 02/03/21 | DAV  | REVISE [REDACTED] REGARDING [REDACTED]   | 2.60  | 975.00   |
| 02/03/21 | DARA | TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]; DRAFT/REVISE [REDACTED]; FOLLOW-UP STRATEGY CALL; EMAIL CORRESPONDENCE AND TELEPHONE CALL WITH [REDACTED] DRAFT/REVISE [REDACTED]; DRAFT/REVISE AND FINALIZE MOTION TO DISMISS, INCLUDING ALL RECORD CITATIONS THEREIN.             | 4.40  | 1,430.00 |
| 02/04/21 | BLC1 | ASSIST WITH MOTION TO DISMISS AMENDED COMPLAINT AND RESPONSE TO APPLICATION FOR SEIZURE, TRO, PRELIMINARY INJUNCTION AND PERMANENT INJUNCTIVE RELIEF   | 1.20  | 318.00   |
| 02/04/21 | DARA | COMMUNICATE WITH [REDACTED] AND WITH [REDACTED] REGARDING [REDACTED] DRAFT/REVISE RESPONSE TO APPLICATION FOR INJUNCTIVE RELIEF; REVIEW/ANALYZE [REDACTED]; PREPARE PROPOSED ORDER DENYING APPLICATION FOR INJUNCTIVE RELIEF; REVIEW/ANALYZE [REDACTED] AND DISCUSS [REDACTED] WITH [REDACTED] | 4.20  | 1,365.00 |
| 02/04/21 | DAV  | (REDUCED CHARGE) ANALYZE [REDACTED] REVISE AND FINALIZE MOTION TO DISMISS.   | 5.90  | 2,212.50 |
| 02/04/21 | DAV  | (REDUCED CHARGE) REVISE AND FINALIZE RESPONSE TO   | 1.80  | 675.00   |





JOHN SAENZ

MATTER #: 120206.000001

INVOICE #: 3383675

MARCH 25, 2021

PAGE 3

| DATE         | ID   | DESCRIPTION   | HOURS        | AMOUNT             |
|--------------|------|---|--------------|--------------------|
|              |      | APPLICATION FOR INJUNCTIVE RELIEF.  |              |                    |
| 02/05/21     | BLC1 | (NO CHARGE .4) ANALYZE [REDACTED]   | 0.00         | 0.00               |
| 02/05/21     | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]   | 0.20         | 75.00              |
| 02/15/21     | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]   | 0.20         | 75.00              |
| 02/23/21     | DAV  | TELEPHONE CALL FROM COUNSEL FOR PLAINTIFF.  | 0.20         | 75.00              |
| 02/26/21     | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]; ANALYZE RESPONSE TO MOTION TO DISMISS AND<br>PREPARE ARGUMENTS FOR REPLY.          | 2.80         | 1,050.00           |
| 02/26/21     | DAV  | BEGIN REVIEWING [REDACTED]<br>[REDACTED]  | 0.40         | 150.00             |
| 02/26/21     | DAV  | TELEPHONE CALL WITH [REDACTED]<br>[REDACTED]  | 0.40         | 150.00             |
| 02/26/21     | DARA | (NO CHARGE 0.8) PRELIMINARY REVIEW OF PLAINTIFF'S RESPONSE<br>TO MOTION TO DISMISS; TELEPHONE CONFERENCE WITH [REDACTED]<br>[REDACTED] REGARDING [REDACTED] | 0.00         | 0.00               |
| <b>TOTAL</b> |      |   | <b>32.40</b> | <b>\$11,308.00</b> |



JOHN SAENZ

MARCH 25, 2021

MATTER #: 120206.000001

INVOICE #: 3383675

PAGE 4

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>      |
|-----------|-------------------|--------------|--------------|--------------------|
| DAV       | DAVID VANDERHIDER | 17.00        | 375.00       | 6,375.00           |
| DARA      | DANIEL A. RAY     | 14.20        | 325.00       | 4,615.00           |
| BLC1      | BARBIE CELAYA     | 1.20         | 265.00       | 318.00             |
|           | <b>TOTAL</b>      | <b>32.40</b> |              | <b>\$11,308.00</b> |



JOHN SAENZ

MARCH 25, 2021

MATTER #: 120206.000001

INVOICE #: 3383675

PAGE 5

**DISBURSEMENTS**

| DATE | DESCRIPTION                | AMOUNT       |
|------|----------------------------|--------------|
|      | PRINTING EXPENSES          | 28.40        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>28.40</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



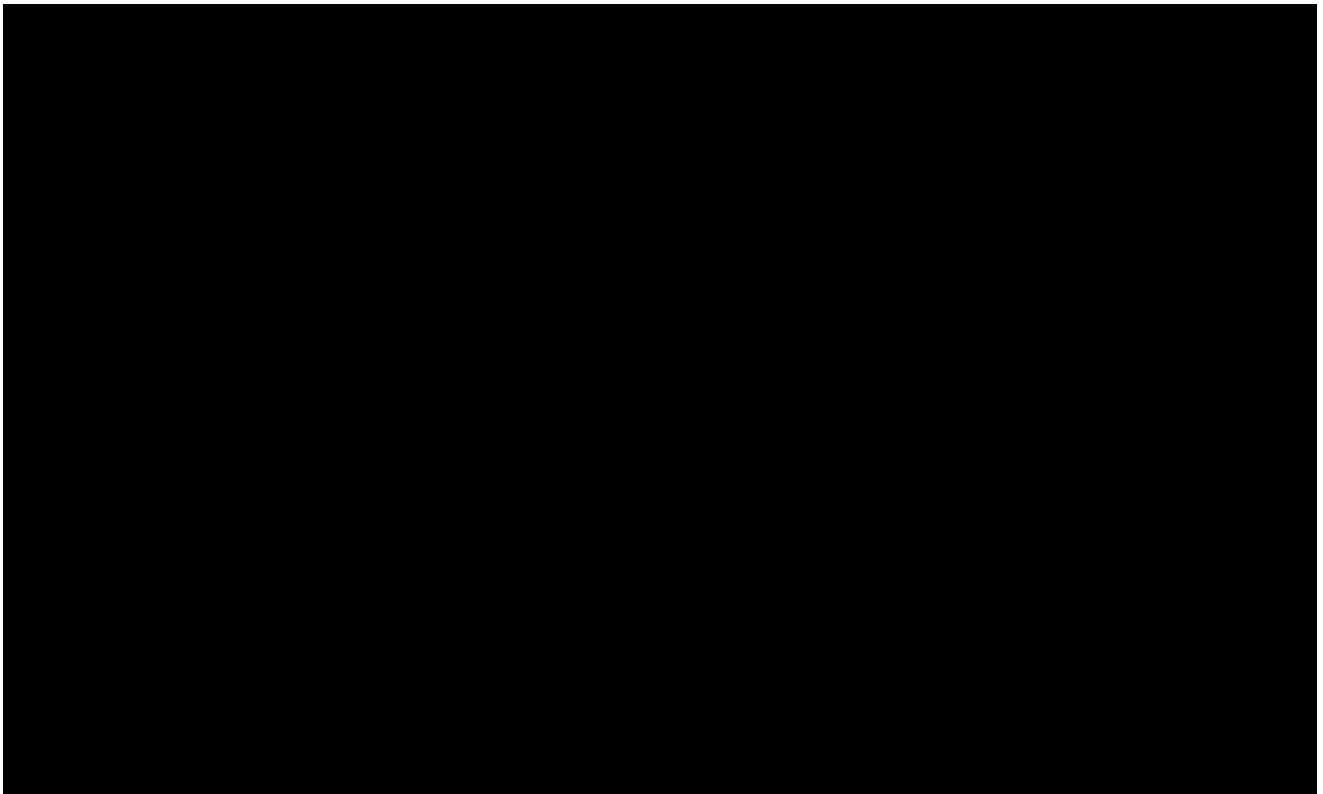
MARCH 25, 2021

MATTER #: 120206.000001

INVOICE #: 3383675

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 11,308.00        |
| DISBURSEMENTS        |           | 28.40            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>11,336.40</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

APRIL 27, 2021  
MATTER #: 120206.000001  
INVOICE #: 3388991

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 7,978.50        |
| DISBURSEMENTS        |           | 11.20           |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>7,989.70</b> |



JOHN SAENZ

APRIL 27, 2021

MATTER #: 120206.000001

INVOICE #: 3388991

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT   |
|----------|------|---|-------|----------|
| 03/01/21 | BLC1 | CALCULATE THE DATE FOR MOTIONS HEARING  | 0.40  | 106.00   |
| 03/01/21 | DAV  | REVISE [REDACTED]<br>[REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED]                           | 0.40  | 150.00   |
| 03/01/21 | DAV  | REVIEW ORDER SETTING HEARING.   | 0.10  | 37.50    |
| 03/02/21 | DAV  | COORDINATE WITH [REDACTED]<br>[REDACTED]  | 0.40  | 150.00   |
| 03/03/21 | DAV  | PREPARE BRIEFING POINTS ON REPLY IN SUPPORT OF MOTION TO DISMISS.                               | 1.50  | 562.50   |
| 03/03/21 | DAV  | ANALYZE ALLEGATIONS AND EVIDENCE IN REPLY IN SUPPORT OF APPLICATION FOR INJUNCTIVE RELIEF.      | 0.80  | 300.00   |
| 03/03/21 | DAV  | PREPARE FOR AND ATTEND [REDACTED]<br>[REDACTED] WITH [REDACTED]                                 | 1.00  | 375.00   |
| 03/04/21 | DAV  | DRAFT REPLY IN SUPPORT OF MOTION TO DISMISS.  | 1.50  | 562.50   |
| 03/04/21 | DAV  | REVIEW CORRESPONDENCE FROM [REDACTED]<br>[REDACTED]   | 0.20  | 75.00    |
| 03/05/21 | DAV  | DRAFT REPLY IN SUPPORT OF MOTION TO DISMISS.  | 2.20  | 825.00   |
| 03/08/21 | RJSU | REVIEW AND ANALYZE CASES CITED IN PLAINTIFF'S RESPONSE TO MOTION TO DISMISS; PREPARE [REDACTED] | 3.40  | 1,105.00 |
| 03/08/21 | DAV  | DRAFT REPLY IN SUPPORT OF MOTION TO DISMISS.  | 0.40  | 150.00   |
| 03/09/21 | RJSU | REVISE REPLY IN SUPPORT OF MOTION TO DISMISS.   | 1.50  | 487.50   |
| 03/09/21 | DAV  | DRAFT REPLY IN SUPPORT OF MOTION TO DISMISS.  | 2.20  | 825.00   |
| 03/10/21 | DAV  | DRAFT REPLY IN SUPPORT OF MOTION TO DISMISS; COORDINATE WITH [REDACTED] REGARDING [REDACTED]    | 1.30  | 487.50   |
| 03/11/21 | DAV  | (REDUCED CHARGE). DRAFT REPLY IN SUPPORT OF MOTION TO DISMISS.                                  | 2.90  | 1,087.50 |
| 03/12/21 | DAV  | COORDINATE WITH [REDACTED]<br>[REDACTED]  | 0.30  | 112.50   |
| 03/15/21 | DAV  | REVIEW MOTION AND ORDER REGARDING PROPOSED HEARING DATE.  | 0.20  | 75.00    |
| 03/30/21 | DAV  | REVIEW [REDACTED]; COORDINATE WITH [REDACTED]<br>REGARDING [REDACTED]                           | 0.60  | 225.00   |



JOHN SAENZ

MATTER #: 120206.000001

INVOICE #: 3388991

APRIL 27, 2021

PAGE 3

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT     |
|----------|------|---|-------|------------|
| 03/31/21 | RJSU | PREPARE [REDACTED]  | 0.40  | 130.00     |
| 03/31/21 | DAV  | EVALUATE GROUNDS FOR SUR-RESPONSE IN LIGHT OF PLAINTIFF'S<br>REPLY BRIEF. | 0.40  | 150.00     |
| TOTAL    |      |   | 22.10 | \$7,978.50 |



JOHN SAENZ

APRIL 27, 2021

MATTER #: 120206.000001

INVOICE #: 3388991

PAGE 4

**BILLING SUMMARY**

| <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATE</b> |
|-------------------|--------------|-------------|
| DAVID VANDERHIDER | 16.40        | 375.00      |
| RYAN J. SULLIVAN  | 5.30         | 325.00      |
| BARBIE CELAYA     | 0.40         | 265.00      |
| <b>TOTAL</b>      | <b>22.10</b> |             |





JOHN SAENZ

APRIL 27, 2021

MATTER #: 120206.000001

INVOICE #: 3388991

PAGE 5

**DISBURSEMENTS**

| DATE | DESCRIPTION                | AMOUNT       |
|------|----------------------------|--------------|
|      | PRINTING EXPENSES          | 11.20        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>11.20</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



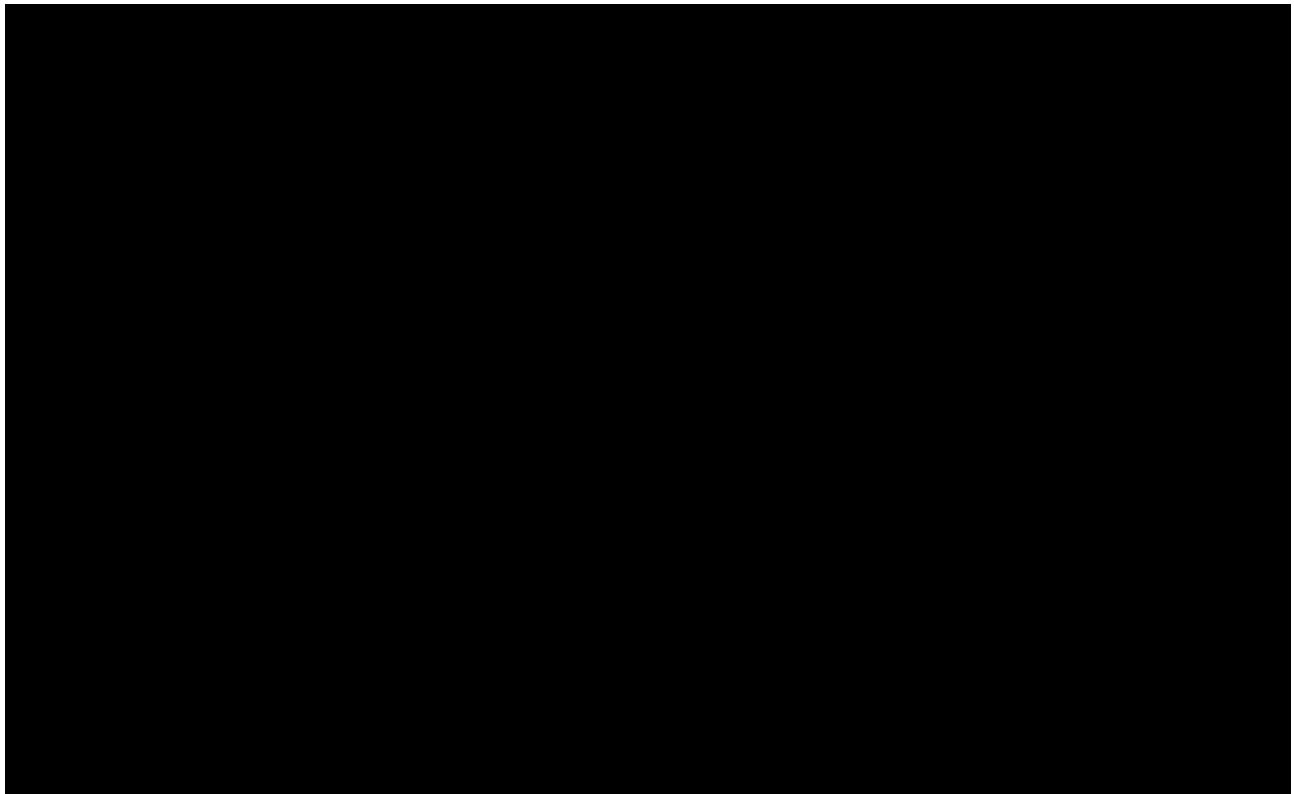
APRIL 27, 2021

MATTER #: 120206.000001

INVOICE #: 3388991

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 7,978.50        |
| DISBURSEMENTS        |           | 11.20           |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>7,989.70</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

MAY 10, 2021  
MATTER #: 120206.000001  
INVOICE #: 3391009

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 14,987.50        |
| DISBURSEMENTS        |           | 167.60           |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>15,155.10</b> |



JOHN SAENZ

MAY 10, 2021

MATTER #: 120206.000001

INVOICE #: 3391009

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT   |
|----------|------|---|-------|----------|
| 04/01/21 | RJSU | REVIEW PLAINTIFF'S REPLY IN SUPPORT OF SEIZURE.   | 0.20  | 65.00    |
| 04/04/21 | RJSU | REVIEW AND ANALYZE PLEADINGS AND EXHIBITS RE: [REDACTED]  | 2.90  | 942.50   |
| 04/05/21 | DAV  | TELEPHONE CALL AND EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.40  | 150.00   |
| 04/05/21 | DAV  | PREPARE [REDACTED]  | 0.90  | 337.50   |
| 04/05/21 | DAV  | REVISE MOTION FOR LEAVE TO FILE SUR-REPLY AND DRAFT SUR-REPLY; REVISE [REDACTED]  | 1.30  | 487.50   |
| 04/05/21 | DAV  | REVIEW AUTHORITIES REGARDING [REDACTED]   | 0.70  | 262.50   |
| 04/05/21 | RJSU | DRAFT SURREPLY, MOTION FOR LEAVE TO FILE SURREPLY, AND PREPARE [REDACTED]   | 3.00  | 975.00   |
| 04/05/21 | RJSU | PREPARE [REDACTED]  | 0.90  | 292.50   |
| 04/05/21 | DAV  | REVIEW AND ANALYSIS OF PLEADINGS, MOTIONS, AND AUTHORITIES; BEGIN PREPARING FOR [REDACTED]  | 0.30  | 112.50   |
| 04/06/21 | BLC1 | (NO CHARGE) ASSIST WITH [REDACTED]  | 0.00  | 0.00     |
| 04/06/21 | DAV  | FINALIZE MOTION FOR LEAVE TO FILE SUR-REPLY, PROPOSED SUR-REPLY, AND PROPOSED ORDER; EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]; COORDINATE [REDACTED] | 1.20  | 450.00   |
| 04/06/21 | DAV  | REVIEW [REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 0.30  | 112.50   |
| 04/06/21 | RJSU | REVIEW ARGUMENTS AND AUTHORITIES FOR HEARING.   | 2.90  | 942.50   |
| 04/07/21 | DAV  | ANALYZE EVIDENCE ATTACHED TO COMPLAINT IN PREPARATION FOR UPCOMING HEARINGS.  | 1.20  | 450.00   |
| 04/08/21 | BLC1 | (REDUCED CHARGE) ANALYZE [REDACTED]   | 2.50  | 500.00   |
| 04/08/21 | DAV  | ANALYZE PLEADINGS, MOTIONS AND AUTHORITIES; PREPARE FOR UPCOMING HEARING.   | 4.20  | 1,575.00 |
| 04/08/21 | RJSU | (REDUCED CHARGE). PREPARE [REDACTED]  | 1.50  | 487.50   |



JOHN SAENZ

MATTER #: 120206.000001

MAY 10, 2021

INVOICE #: 3391009

PAGE 3

| DATE         | ID   | DESCRIPTION   | HOURS        | AMOUNT             |
|--------------|------|---|--------------|--------------------|
| 04/08/21     | DAV  | TELEPHONE CALL WITH OPPOSING COUNSEL REGARDING HEARING AND REQUEST FOR INSPECTION; COORDINATE WITH [REDACTED]   | 0.40         | 150.00             |
| 04/09/21     | BLC1 | (REDUCED CHARGE) CONTINUE PREPARING [REDACTED] FOR [REDACTED]   | 0.90         | 180.00             |
| 04/09/21     | RJSU | PREPARE STRATEGY FOR HEARING ON MOTIONS TO DISMISS.   | 1.50         | 487.50             |
| 04/09/21     | DAV  | ANALYZE AUTHORITIES AND ARGUMENTS IN PREPARATION FOR UPCOMING HEARING.  | 1.80         | 675.00             |
| 04/11/21     | RJSU | PREPARE ARGUMENTS FOR HEARING ON MOTION TO DISMISS AND APPLICATION FOR INJUNCTIVE RELIEF.   | 0.50         | 162.50             |
| 04/12/21     | BLC1 | ANALYZE [REDACTED]  | 0.90         | 180.00             |
| 04/12/21     | BLC1 | DETERMINE [REDACTED]  | 0.40         | 80.00              |
| 04/12/21     | RJSU | REVIEW CASE LAW FROM APPLICATION FOR INJUNCTIVE RELIEF AND OPPOSITION, IN PREPARATION FOR HEARING.  | 3.00         | 975.00             |
| 04/12/21     | RJSU | (REDUCED CHARGE) PREPARE STRATEGY FOR HEARING ON APPLICATION FOR INJUNCTIVE RELIEF.   | 3.20         | 1,040.00           |
| 04/12/21     | RJSU | PREPARE AND REFINE [REDACTED]   | 3.20         | 1,040.00           |
| 04/12/21     | DAV  | TELEPHONE CALL WITH [REDACTED] REGARDING [REDACTED]<br>TELEPHONE CALL WITH [REDACTED] REGARDING [REDACTED]  | 1.50         | 562.50             |
| 04/12/21     | DAV  | (REDUCED CHARGE) ANALYZE MOTIONS, EVIDENCE, AND AUTHORITIES; EVALUATE GROUNDS FOR RULE 12(B)(6) DISMISSAL BASED ON RESPONSE TO MOTION; PREPARE FOR [REDACTED] | 3.50         | 1,312.50           |
| <b>TOTAL</b> |      |   | <b>45.20</b> | <b>\$14,987.50</b> |



JOHN SAENZ

MAY 10, 2021

MATTER #: 120206.000001

INVOICE #: 3391009

PAGE 4

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>      |
|-----------|-------------------|--------------|--------------|--------------------|
| DAV       | DAVID VANDERHIDER | 17.70        | 375.00       | 6,637.50           |
| RJSU      | RYAN J. SULLIVAN  | 22.80        | 325.00       | 7,410.00           |
| BLC1      | BARBIE CELAYA     | 4.70         | 200.00       | 940.00             |
|           | <b>TOTAL</b>      | <b>45.20</b> |              | <b>\$14,987.50</b> |



JOHN SAENZ

MAY 10, 2021

MATTER #: 120206.000001

INVOICE #: 3391009

PAGE 5

**DISBURSEMENTS**

| DATE | DESCRIPTION                | AMOUNT        |
|------|----------------------------|---------------|
|      | PRINTING EXPENSES          | 167.60        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>167.60</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



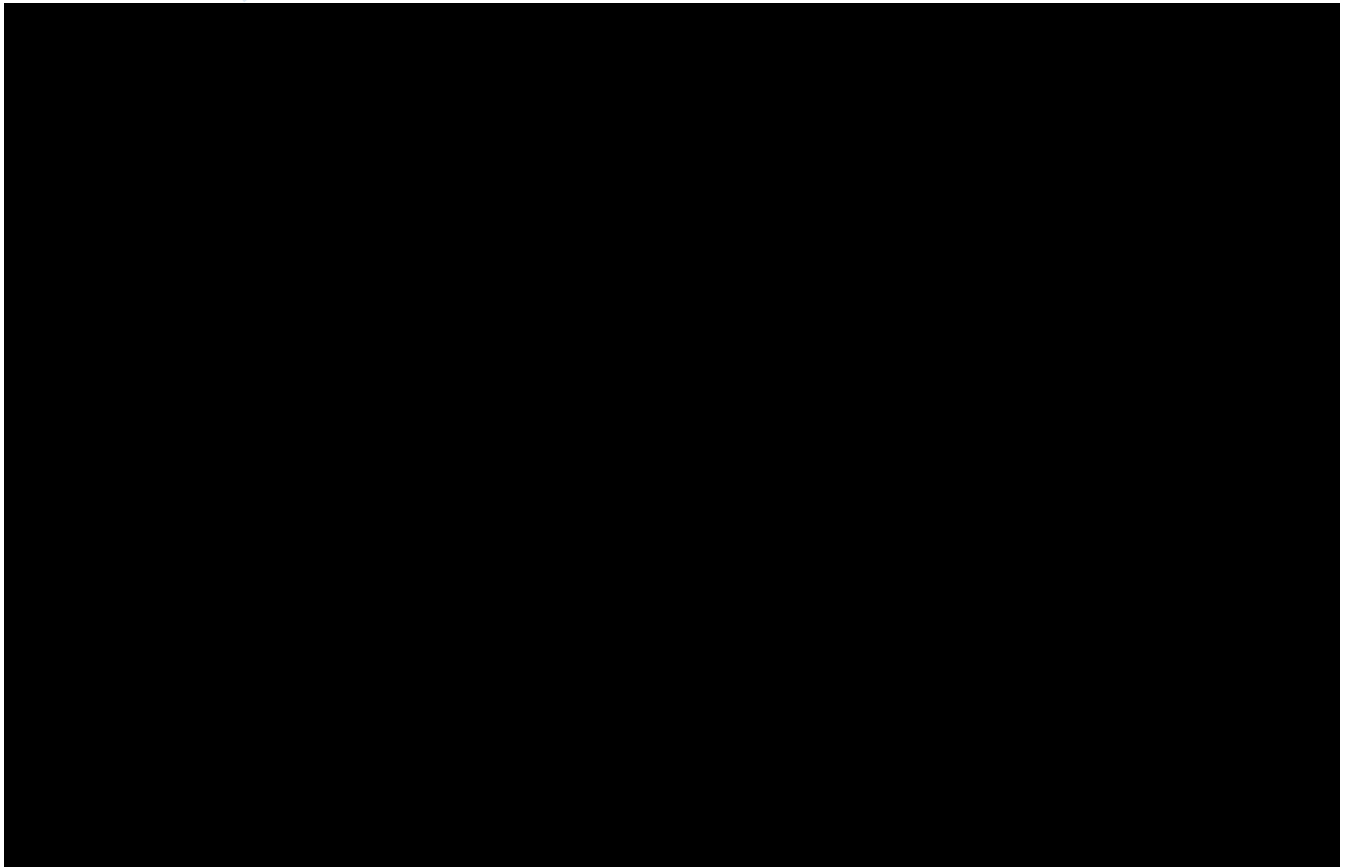
MAY 10, 2021

MATTER #: 120206.000001

INVOICE #: 3391009

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 14,987.50        |
| DISBURSEMENTS        |           | 167.60           |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>15,155.10</b> |

REMITTANCE







400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

JUNE 24, 2021  
MATTER #: 120206.000001  
INVOICE #: 3399377

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 11,237.50        |
| DISBURSEMENTS        |           | 6.80             |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>11,244.30</b> |



JOHN SAENZ

JUNE 24, 2021

MATTER #: 120206.000001

INVOICE #: 3399377

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT   |
|----------|------|---|-------|----------|
| 04/13/21 | RJSU | PREPARE FOR, ATTEND, AND ARGUE AT HEARING ON MOTIONS TO DISMISS.  | 5.90  | 1,917.50 |
| 04/13/21 | DAV  | TELEPHONE CALLS WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]  | 1.70  | 637.50   |
| 04/13/21 | DAV  | PREPARE FOR AND ATTEND HEARING ON PENDING MOTIONS.  | 5.90  | 2,212.50 |
| 04/14/21 | RJSU | PREPARE PROPOSED AGREEMENT RE: INJUNCTIVE RELIEF (2.3);<br>CORRESPONDENCE WITH OPPOSING COUNSEL RE: SAME (.2).              | 2.50  | 812.50   |
| 04/14/21 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]   | 0.40  | 150.00   |
| 04/14/21 | DAV  | DRAFT PROPOSED AGREEMENT DISPOSING OF INJUNCTIVE RELIEF,<br>INCLUDING PROVISIONS REGARDING [REDACTED]<br>[REDACTED]         | 0.80  | 300.00   |
| 04/15/21 | RJSU | CALL WITH [REDACTED] RE: [REDACTED]<br>[REDACTED]   | 0.50  | 162.50   |
| 04/15/21 | RJSU | (REDUCED CHARGE) COORDINATE WITH OPPOSING COUNSEL TO<br>RE: POTENTIAL AGREEMENT RE: INJUNCTIVE RELIEF.                      | 0.90  | 292.50   |
| 04/15/21 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]   | 0.40  | 150.00   |
| 04/15/21 | DAV  | REVISE POTENTIAL AGREEMENT DISPOSING OF INJUNCTIVE<br>RELIEF; EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL<br>REGARDING SAME. | 0.60  | 225.00   |
| 04/16/21 | RJSU | (REDUCED CHARGE) COORDINATE WITH OPPOSING COUNSEL TO<br>PREPARE JOINT ADVISORY, PURSUANT TO COURT ORDER.                    | 1.40  | 455.00   |
| 04/16/21 | MLFR | ASSIST WITH [REDACTED]<br>[REDACTED] REGARDING [REDACTED]   | 0.80  | 300.00   |
| 04/16/21 | DAV  | ANALYZE [REDACTED]<br>[REDACTED];<br>COORDINATE [REDACTED]  | 1.30  | 487.50   |
| 04/19/21 | DAV  | EVALUATE [REDACTED]<br>[REDACTED]   | 0.30  | 112.50   |
| 05/14/21 | BLC1 | ANALYZE [REDACTED]<br>[REDACTED]  | 0.40  | 80.00    |



JOHN SAENZ

MATTER #: 120206.000001

JUNE 24, 2021

INVOICE #: 3399377

PAGE 3

| DATE         | ID   | DESCRIPTION   | HOURS        | AMOUNT             |
|--------------|------|---|--------------|--------------------|
| 05/14/21     | DARA | (NO CHARGE) REVIEW/ANALYZE [REDACTED]<br>[REDACTED]; COMMUNICATE WITH [REDACTED]<br>[REDACTED] REGARDING [REDACTED] | 0.00         | 0.00               |
| 05/14/21     | RJSU | REVIEW AND ANALYZE [REDACTED]<br>[REDACTED]   | 0.40         | 130.00             |
| 05/14/21     | DAV  | (REDUCED CHARGE) REVIEW AND ANALYZE REPORT AND<br>RECOMMENDATION ON APPLICATION FOR INJUNCTIVE RELIEF.              | 0.50         | 187.50             |
| 05/15/21     | RJSU | DRAFT [REDACTED]<br>[REDACTED]  | 0.50         | 162.50             |
| 05/15/21     | DAV  | COORDINATE WITH [REDACTED]<br>[REDACTED]  | 0.40         | 150.00             |
| 05/17/21     | DAV  | EVALUATE [REDACTED]; EMAIL<br>CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]                     | 0.80         | 300.00             |
| 05/18/21     | DAV  | ANALYZE REPORT AND RECOMMENDATIONS; EVALUATE<br>[REDACTED]; EVALUATE [REDACTED]<br>[REDACTED]                       | 1.90         | 712.50             |
| 05/18/21     | DAV  | TELEPHONE CALLS TO [REDACTED]<br>[REDACTED] REGARDING [REDACTED]  | 0.40         | 150.00             |
| 05/18/21     | DAV  | TELEPHONE CALL WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]   | 0.60         | 225.00             |
| 05/18/21     | RJSU | CALL WITH [REDACTED]<br>[REDACTED]  | 1.00         | 325.00             |
| 05/18/21     | RJSU | ANALYZE [REDACTED] RE:<br>[REDACTED]  | 1.50         | 487.50             |
| 05/18/21     | MLFR | ANALYZE [REDACTED]<br>[REDACTED]  | 0.10         | 37.50              |
| 05/19/21     | DAV  | COORDINATE WITH OPPOSING COUNSEL REGARDING MOTION TO<br>WITHDRAW.   | 0.20         | 75.00              |
| <b>TOTAL</b> |      |   | <b>32.10</b> | <b>\$11,237.50</b> |



JOHN SAENZ

JUNE 24, 2021

MATTER #: 120206.000001

INVOICE #: 3399377

PAGE 4

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>      |
|-----------|-------------------|--------------|--------------|--------------------|
| DAV       | DAVID VANDERHIDER | 16.20        | 375.00       | 6,075.00           |
| MLFR      | MELANIE FRY       | 0.90         | 375.00       | 337.50             |
| RJSU      | RYAN J. SULLIVAN  | 14.60        | 325.00       | 4,745.00           |
| DARA      | DANIEL A. RAY     | 0.00         | 0.00         | 0.00               |
| BLC1      | BARBIE CELAYA     | 0.40         | 200.00       | 80.00              |
|           | <b>TOTAL</b>      | <b>32.10</b> |              | <b>\$11,237.50</b> |



JOHN SAENZ

JUNE 24, 2021

MATTER #: 120206.000001

INVOICE #: 3399377

PAGE 5

**DISBURSEMENTS**

| DATE | DESCRIPTION                | AMOUNT      |
|------|----------------------------|-------------|
|      | PRINTING EXPENSES          | 6.80        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>6.80</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



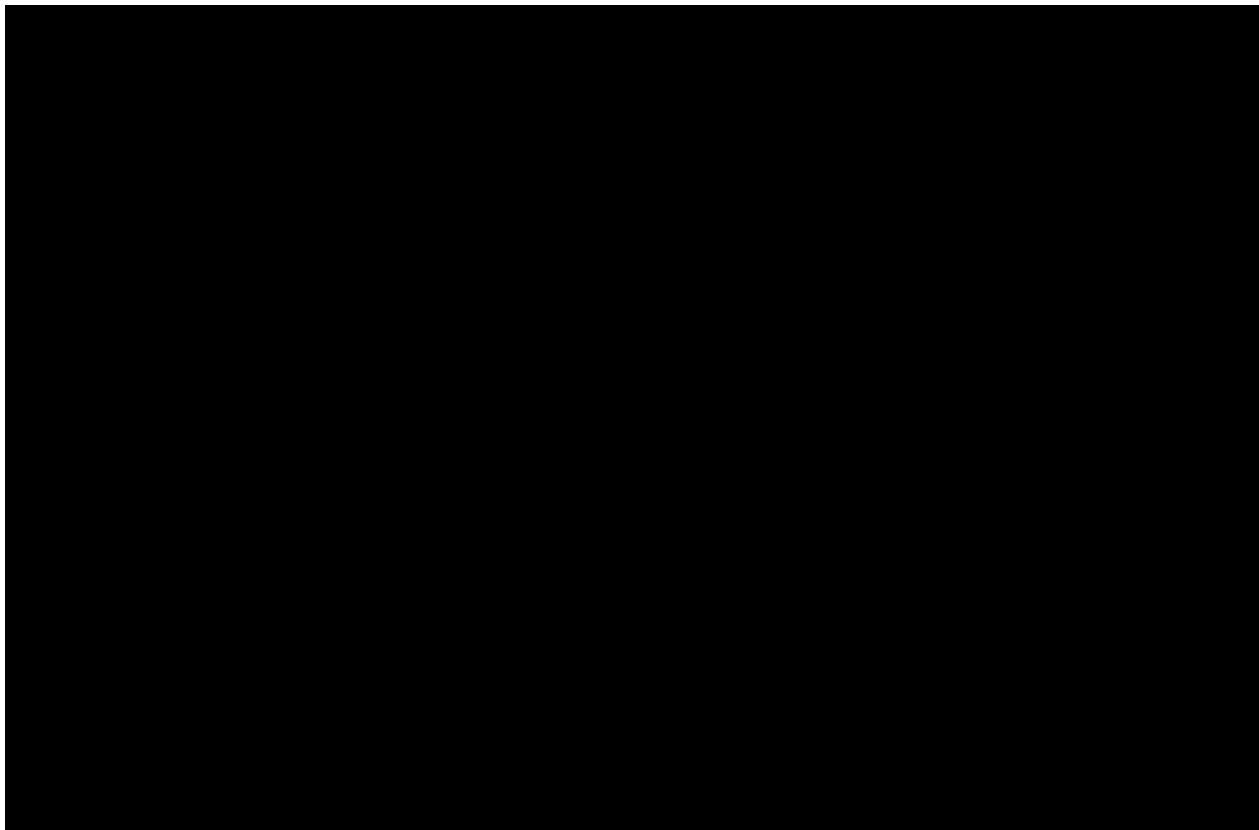
JUNE 24, 2021

MATTER #: 120206.000001

INVOICE #: 3399377

|                      |           |                  |
|----------------------|-----------|------------------|
| FEES                 | \$        | 11,237.50        |
| DISBURSEMENTS        |           | 6.80             |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>11,244.30</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ



**DUE UPON RECEIPT**

JULY 22, 2021

MATTER #: 120206.000001

INVOICE #: 3403782

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 8,547.50        |
| DISBURSEMENTS        |           | 2.00            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>8,549.50</b> |



JOHN SAENZ

JULY 22, 2021

MATTER #: 120206.000001

INVOICE #: 3403782

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION  | HOURS | AMOUNT   |
|----------|------|--|-------|----------|
| 05/26/21 | RJSU | (REDUCED CHARGE FROM 6.7) DRAFT OBJECTIONS TO MAGISTRATE'S REPORT.   | 5.70  | 1,852.50 |
| 05/27/21 | RJSU | REVISE OBJECTIONS TO MAGISTRATE'S REPORT.  | 2.90  | 942.50   |
| 05/27/21 | DAV  | ANALYZE [REDACTED]   | 0.60  | 225.00   |
| 05/31/21 | DAV  | ANALYZE [REDACTED]   | 2.90  | 1,087.50 |
| 06/01/21 | BLC1 | ASSIST WITH [REDACTED]   | 0.60  | 120.00   |
| 06/01/21 | DAV  | FINALIZE OBJECTIONS TO REPORT AND RECOMMENDATION OF UNITED STATES MAGISTRATE JUDGE; COORDINATE [REDACTED]                | 0.90  | 337.50   |
| 06/01/21 | DAV  | EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING REQUEST FOR INFORMATION; REVIEW CORRESPONDENCE FROM MR. VILLARREAL. | 0.30  | 112.50   |
| 06/01/21 | RJSU | DRAFT OBJECTIONS TO MAGISTRATE REPORT AND RECOMMENDATIONS.   | 0.80  | 260.00   |
| 06/02/21 | DAV  | TELEPHONE CALLS AND EMAIL CORRESPONDENCE WITH [REDACTED]; EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL AND MR. VILLARREAL. | 0.80  | 300.00   |
| 06/03/21 | DAV  | REVIEW CORRESPONDENCE FROM MR. VILLARREAL REQUESTING EXPERT INFORMATION.   | 0.10  | 37.50    |
| 06/04/21 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]  | 0.30  | 112.50   |
| 06/04/21 | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]; EMAIL CORRESPONDENCE WITH MR. VILLARREAL.                               | 0.30  | 112.50   |
| 06/04/21 | DAV  | REVIEW [REDACTED] FROM [REDACTED]; ANALYZE [REDACTED]  | 0.80  | 300.00   |
| 06/04/21 | RJSU | (NO CHARGE) RESEARCH [REDACTED]  | 0.00  | 0.00     |
| 06/05/21 | DAV  | EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING CONSENT ISSUES.   | 0.10  | 37.50    |
| 06/06/21 | DAV  | EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING   | 0.10  | 37.50    |





JOHN SAENZ

MATTER #: 120206.000001

JULY 22, 2021

INVOICE #: 3403782

PAGE 3

| DATE     | ID    | DESCRIPTION  | HOURS | AMOUNT |
|----------|-------|--|-------|--------|
|          |       | CONSENT ISSUES.  |       |        |
| 06/07/21 | DAV   | TELEPHONE CALL AND EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING WITHDRAWAL AND COMMUNICATIONS WITH PLAINTIFFS; TELEPHONE CALL TO COUNSEL FOR [REDACTED] REGARDING [REDACTED] | 0.60  | 225.00 |
| 06/07/21 | DAV   | EMAIL CORRESPONDENCE WITH MR. VILLARREAL REGARDING REQUEST FOR INFORMATION.  | 0.60  | 225.00 |
| 06/09/21 | CAWES | (NO CHARGE) RESEARCHING [REDACTED]   | 0.00  | 0.00   |
| 06/09/21 | DAV   | TELEPHONE CALLS WITH OPPOSING COUNSEL AND COUNSEL FOR CO-DEFENDANTS REGARDING WITHDRAWAL AND CONSENT TO COMMUNICATING WITH MR. VILLARREAL.   | 0.80  | 300.00 |
| 06/09/21 | DAV   | EVALUATE [REDACTED] REGARDING [REDACTED] EMAIL CORRESPONDENCE TO [REDACTED]  | 0.50  | 187.50 |
| 06/09/21 | DAV   | EMAIL CORRESPONDENCE TO MR. VILLARREAL REGARDING PRIOR SETTLEMENT OFFER.   | 0.30  | 112.50 |
| 06/09/21 | RJSU  | (NO CHARGE) CALL WITH [REDACTED]   | 0.00  | 0.00   |
| 06/10/21 | DAV   | ATTEND [REDACTED] WITH [REDACTED]  | 0.80  | 300.00 |
| 06/15/21 | DARA  | REVIEW/ANALYZE [REDACTED]  | 0.70  | 227.50 |
| 06/16/21 | DAV   | DRAFT [REDACTED]   | 0.60  | 225.00 |
| 06/16/21 | DARA  | DRAFT [REDACTED] AND COMMUNICATE WITH [REDACTED]   | 1.80  | 585.00 |
| 06/25/21 | DAV   | REVIEW, ANALYZE, AND RETURN EMAIL CORRESPONDENCE WITH MR. VILLARREAL REGARDING POTENTIAL FOR RESOLUTION.   | 0.40  | 150.00 |
| 06/25/21 | DAV   | (NO CHARGE) REVIEW ORDER GRANTING WITHDRAWAL.  | 0.00  | 0.00   |
| 06/25/21 | DARA  | REVIEW/ANALYZE [REDACTED] AND DISCUSS THE SAME WITH [REDACTED] EMAIL CORRESPONDENCE WITH JONATHAN VILLAREAL REGARDING POTENTIAL RESOLUTION.  | 0.30  | 97.50  |
| 06/29/21 | DAV   | COORDINATE WITH [REDACTED] REGARDING [REDACTED]  | 0.10  | 37.50  |



JOHN SAENZ

JULY 22, 2021

MATTER #: 120206.000001

INVOICE #: 3403782

PAGE 4

**TOTAL**

**24.70**

**\$8,547.50**



JOHN SAENZ

JULY 22, 2021

MATTER #: 120206.000001

INVOICE #: 3403782

PAGE 5

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>     |
|-----------|-------------------|--------------|--------------|-------------------|
| DAV       | DAVID VANDERHIDER | 11.90        | 375.00       | 4,462.50          |
| RJSU      | RYAN J. SULLIVAN  | 9.40         | 325.00       | 3,055.00          |
| DARA      | DANIEL A. RAY     | 2.80         | 325.00       | 910.00            |
| BLC1      | BARBIE CELAYA     | 0.60         | 200.00       | 120.00            |
| CAWES     | COY A. WESTBROOK  | 0.00         | 0.00         | 0.00              |
|           | <b>TOTAL</b>      | <b>24.70</b> |              | <b>\$8,547.50</b> |



JOHN SAENZ

JULY 22, 2021

MATTER #: 120206.000001

INVOICE #: 3403782

PAGE 6

**DISBURSEMENTS**

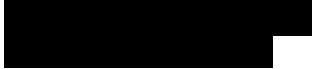
| DATE | DESCRIPTION                | AMOUNT      |
|------|----------------------------|-------------|
|      | PRINTING EXPENSES          | 2.00        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>2.00</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



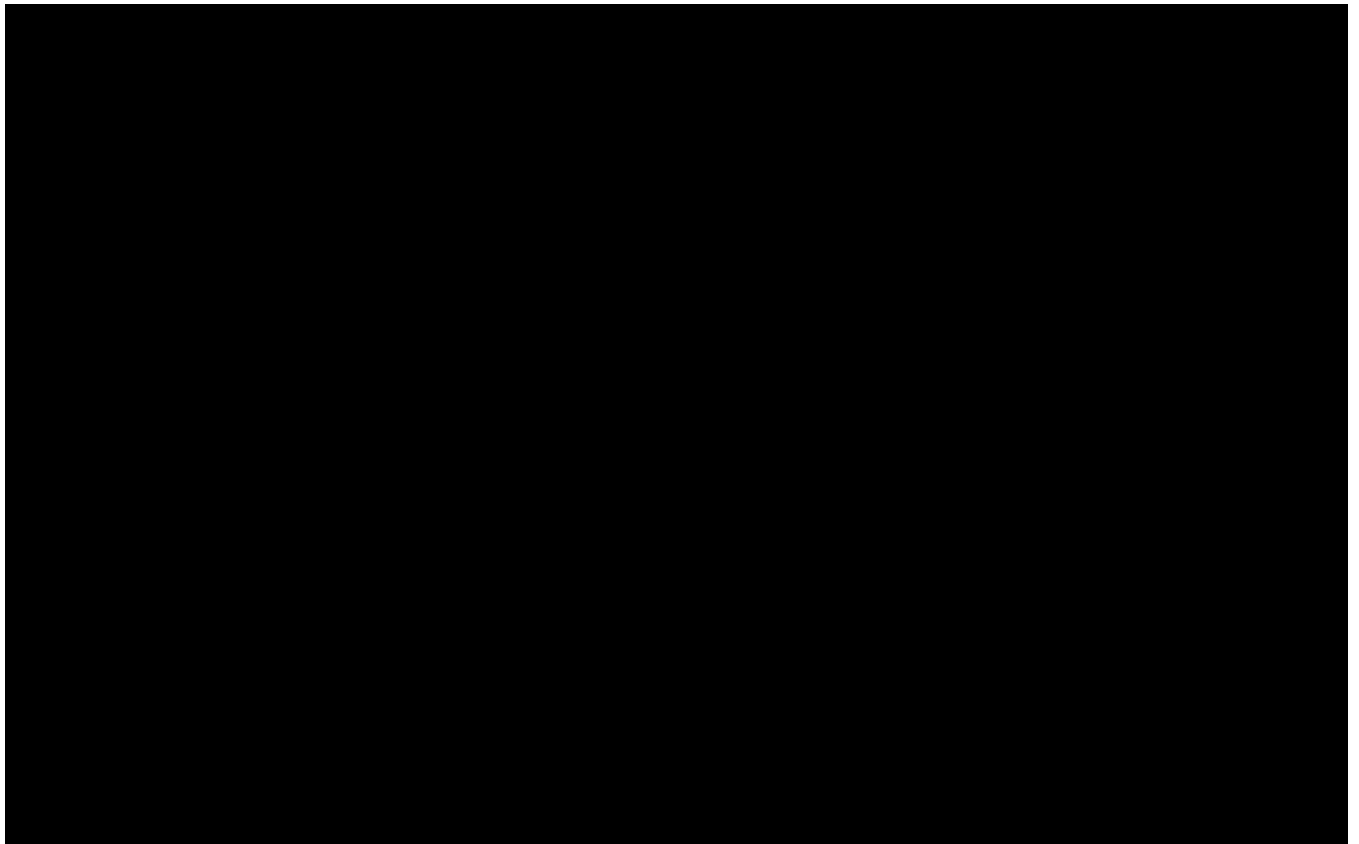
JULY 22, 2021

MATTER #: 120206.000001

INVOICE #: 3403782

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 8,547.50        |
| DISBURSEMENTS        |           | 2.00            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>8,549.50</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ



**DUE UPON RECEIPT**

AUGUST 25, 2021

MATTER #: 120206.000001

INVOICE #: 3408883

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |               |
|----------------------|-----------|---------------|
| FEES                 | \$        | 242.50        |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>242.50</b> |



JOHN SAENZ

AUGUST 25, 2021

MATTER #: 120206.000001

INVOICE #: 3408883

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION  | HOURS | AMOUNT   |
|----------|------|--|-------|----------|
| 07/26/21 | DAV  | REVIEW MOTION FOR EXTENSION OF TIME TO RETAIN COUNSEL. | 0.30  | 112.50   |
| 07/27/21 | DARA | ANALYZE [REDACTED]<br>[REDACTED]                       | 0.40  | 130.00   |
| TOTAL    |      |  | 0.70  | \$242.50 |



JOHN SAENZ

AUGUST 25, 2021

MATTER #: 120206.000001

INVOICE #: 3408883

PAGE 3

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>   |
|-----------|-------------------|--------------|--------------|-----------------|
| DAV       | DAVID VANDERHIDER | 0.30         | 375.00       | 112.50          |
| DARA      | DANIEL A. RAY     | 0.40         | 325.00       | 130.00          |
|           | <b>TOTAL</b>      | <b>0.70</b>  |              | <b>\$242.50</b> |





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



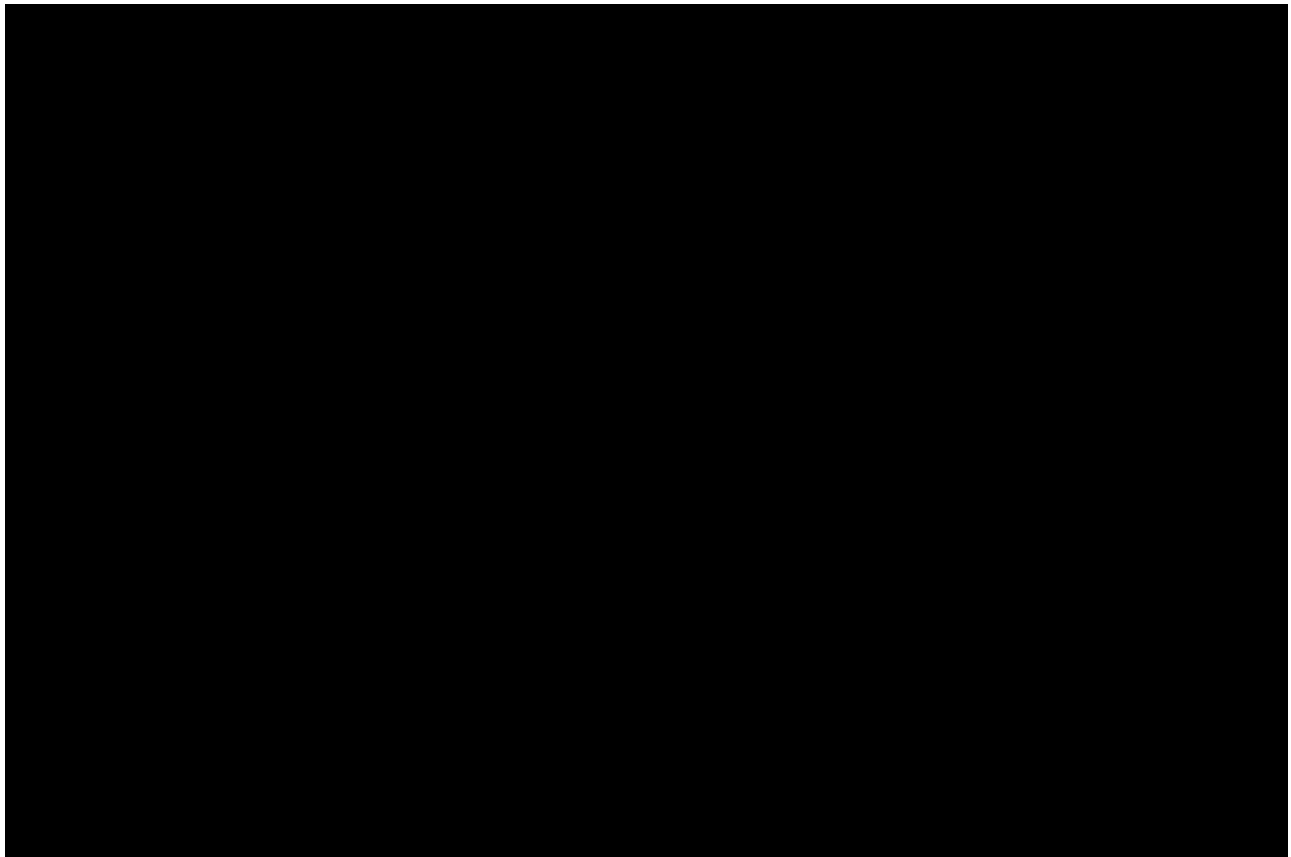
AUGUST 25, 2021

MATTER #: 120206.000001

INVOICE #: 3408883

|                      |           |               |
|----------------------|-----------|---------------|
| FEES                 | \$        | 242.50        |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>242.50</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

SEPTEMBER 27, 2021  
MATTER #: 120206.000001  
INVOICE #: 3414362

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 8,832.50        |
| DISBURSEMENTS        |           | 1.00            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>8,833.50</b> |



JOHN SAENZ

SEPTEMBER 27, 2021

MATTER #: 120206.000001

INVOICE #: 3414362

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT   |
|----------|------|---|-------|----------|
| 08/04/21 | DARA | REVIEW/ANALYZE [REDACTED]<br>[REDACTED]; EMAIL<br>CORRESPONDENCE AND DISCUSSION WITH<br>REGARDING [REDACTED]<br>EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]   | 0.90  | 292.50   |
| 08/04/21 | DAV  | REVIEW ORDER ADOPTING REPORT AND RECOMMENDATION OF<br>MAGISTRATE.   | 0.40  | 150.00   |
| 08/05/21 | DARA | (NO CHARGE) REVIEW/ANALYZE [REDACTED]<br>[REDACTED]; COMMUNICATE WITH [REDACTED]<br>REGARDING [REDACTED]  | 0.00  | 0.00     |
| 08/06/21 | DARA | REVIEW/ANALYZE TEXT ORDER FROM THE COURT GRANTING<br>MOTION FOR EXTENSION OF TIME; DISCUSS [REDACTED]<br>[REDACTED] WITH [REDACTED]<br>REVIEW/ANALYZE [REDACTED]<br>[REDACTED]  | 0.80  | 260.00   |
| 08/06/21 | DAV  | (NO CHARGE) ANALYZE [REDACTED]  | 0.00  | 0.00     |
| 08/09/21 | BLC1 | (NO CHARGE) CALCULATE THE DEADLINE FOR PLAINTIFF TO<br>OBTAIN A NEW ATTORNEY  | 0.00  | 0.00     |
| 08/09/21 | DARA | EMAIL CORRESPONDENCE WITH JONATHAN VILLAREAL<br>REGARDING AGREEMENT TO EXTENSION OF TIME TO FILE<br>RESPONSIVE PLEADING; DRAFT PROPOSED STIPULATION AND<br>MOTION FOR EXTENSION OF TIME, AS WELL AS PROPOSED ORDER<br>GRANTING THE SAME; ADDITIONAL CORRESPONDENCE WITH<br>JONATHAN VILLAREAL REGARDING OPPOSITION TO PROPOSED<br>STIPULATION AND MOTION; EMAIL CORRESPONDENCE AND<br>TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]<br>[REDACTED]; DISCUSS [REDACTED]<br>[REDACTED] WITH [REDACTED] | 3.40  | 1,105.00 |
| 08/12/21 | DARA | BEGIN DRAFTING DEFENDANT'S ORIGINAL ANSWER TO<br>PLAINTIFF'S FIRST AMENDED COMPLAINT.   | 4.30  | 1,397.50 |
| 08/13/21 | DARA | CONTINUE DRAFTING DEFENDANT'S ANSWER TO PLAINTIFFS'<br>FIRST AMENDED COMPLAINT; DISCUSS [REDACTED]<br>[REDACTED] WITH [REDACTED]  | 2.60  | 845.00   |
| 08/16/21 | DARA | DRAFT/REVISE INITIAL DRAFT OF ANSWER AND COUNTERCLAIM;<br>DISCUSS THE SAME WITH [REDACTED]; EMAIL<br>CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]  | 3.10  | 1,007.50 |



JOHN SAENZ

MATTER #: 120206.000001

SEPTEMBER 27, 2021

INVOICE #: 3414362

PAGE 3

| DATE         | ID   | DESCRIPTION   | HOURS        | AMOUNT            |
|--------------|------|---|--------------|-------------------|
|              |      | [REDACTED]  |              |                   |
| 08/17/21     | DAV  | REVIEW AND REVISE ANSWER TO FIRST AMENDED COMPLAINT AND ORIGINAL COUNTERCLAIM.  | 2.10         | 787.50            |
| 08/17/21     | DARA | DRAFT/REVISE AND FINALIZE ANSWER AND COUNTERCLAIM; TELEPHONE CALL WITH [REDACTED] REGARDING [REDACTED] FOLLOW-UP EMAIL CORRESPONDENCE REGARDING [REDACTED]  | 2.90         | 942.50            |
| 08/18/21     | BLC1 | COMMUNICATE WITH [REDACTED] CONCERNING [REDACTED]   | 0.40         | 80.00             |
| 08/18/21     | DAV  | EVALUATE [REDACTED]   | 0.40         | 150.00            |
| 08/18/21     | DAV  | TELEPHONE CALL WITH [REDACTED] REGARDING [REDACTED]   | 0.80         | 300.00            |
| 08/18/21     | DAV  | REVIEW AND REVISE ANSWER TO FIRST AMENDED COMPLAINT AND ORIGINAL COUNTERCLAIM.  | 1.70         | 637.50            |
| 08/18/21     | DARA | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]; EVALUATE [REDACTED] TEAMS CONFERENCE WITH [REDACTED] TO [REDACTED] DRAFT/REVISE AND FINALIZE ANSWER AND COUNTERCLAIM ACCORDINGLY, AND DISCUSS THE SAME WITH [REDACTED] COORDINATE [REDACTED] | 2.70         | 877.50            |
| <b>TOTAL</b> |      |   | <b>26.50</b> | <b>\$8,832.50</b> |



JOHN SAENZ

SEPTEMBER 27, 2021

MATTER #: 120206.000001

INVOICE #: 3414362

PAGE 4

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>     |
|-----------|-------------------|--------------|--------------|-------------------|
| DAV       | DAVID VANDERHIDER | 5.40         | 375.00       | 2,025.00          |
| DARA      | DANIEL A. RAY     | 20.70        | 325.00       | 6,727.50          |
| BLC1      | BARBIE CELAYA     | 0.40         | 200.00       | 80.00             |
|           | <b>TOTAL</b>      | <b>26.50</b> |              | <b>\$8,832.50</b> |



JOHN SAENZ

SEPTEMBER 27, 2021

MATTER #: 120206.000001

INVOICE #: 3414362

PAGE 5

**DISBURSEMENTS**

| DATE                       | DESCRIPTION  | AMOUNT      |
|----------------------------|--|-------------|
| 06/09/21                   | VENDOR: TEXAS SECRETARY OF STATE; INVOICE#: 545703084:063021CONT.; DATE: 6/30/2021 - WEB INQUIRY | 1.00        |
| <b>TOTAL DISBURSEMENTS</b> |  | <b>1.00</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

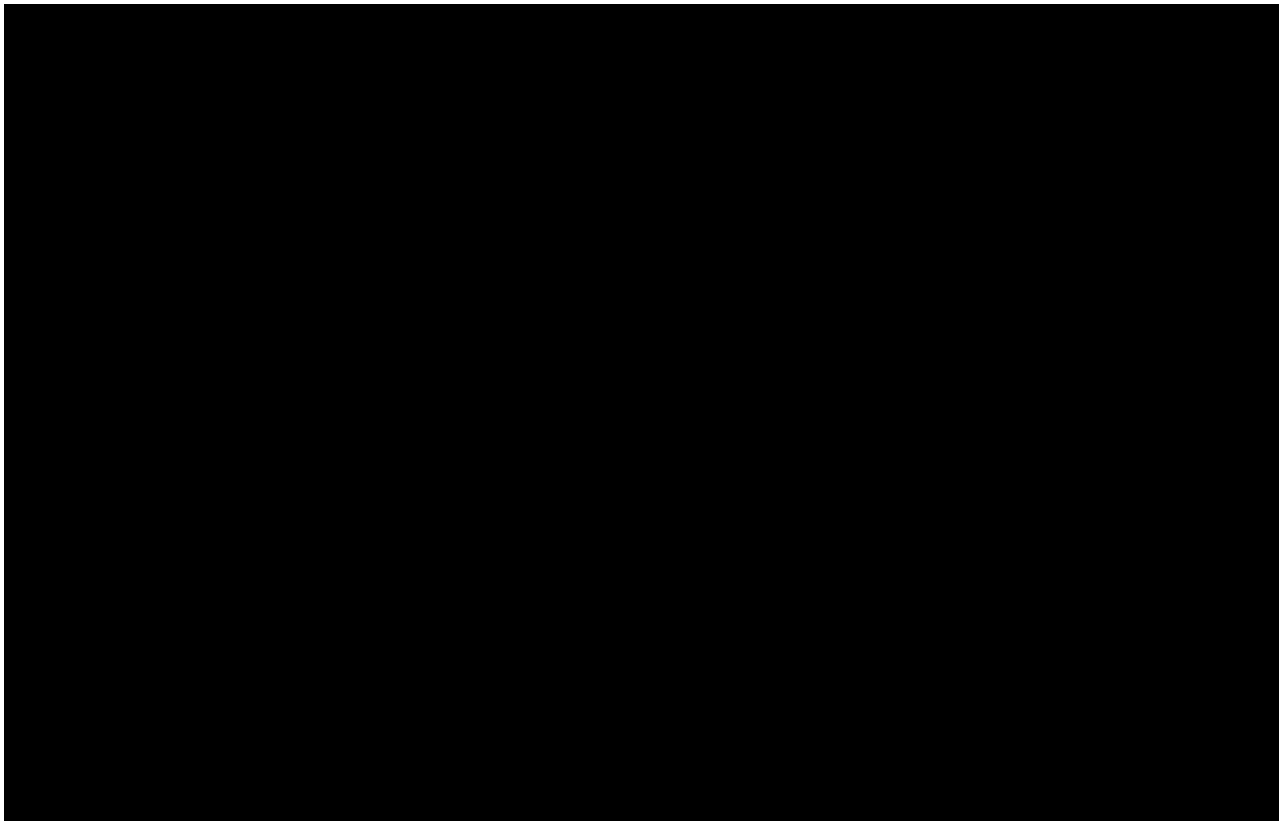
JOHN SAENZ



SEPTEMBER 27, 2021  
MATTER #: 120206.000001  
INVOICE #: 3414362

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 8,832.50        |
| DISBURSEMENTS        |           | 1.00            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>8,833.50</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ



**DUE UPON RECEIPT**

OCTOBER 20, 2021

MATTER #: 120206.000001

INVOICE #: 3418854

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 6,470.00        |
| DISBURSEMENTS        |           | 8.20            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>6,478.20</b> |





JOHN SAENZ

OCTOBER 20, 2021

MATTER #: 120206.000001

INVOICE #: 3418854

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE     | ID   | DESCRIPTION   | HOURS | AMOUNT   |
|----------|------|---|-------|----------|
| 09/20/21 | DARA | COMMUNICATE WITH [REDACTED] REGARDING [REDACTED]  | 0.20  | 65.00    |
| 09/22/21 | DARA | REVIEW/ANALYZE [REDACTED]   | 0.70  | 227.50   |
| 09/22/21 | DAV  | REVIEW MOTION FOR SANCTIONS FILED BY JONATHAN VILLARREAL.   | 0.80  | 300.00   |
| 09/23/21 | DARA | TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]   | 0.30  | 97.50    |
| 09/23/21 | DAV  | EVALUATE STRATEGY FOR RESPONSE TO MOTION FOR SANCTIONS.   | 0.70  | 262.50   |
| 09/23/21 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]   | 0.10  | 37.50    |
| 09/24/21 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]   | 0.40  | 150.00   |
| 09/27/21 | DARA | DRAFT DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION TO SANCTION; REVIEW/ANALYZE LIVE PLEADINGS AND CASE FILE MATERIALS IN SUPPORT OF THE SAME; REVIEW/ANALYZE CASE LAW AND SECONDARY SOURCES REGARDING FEDERAL RULE OF CIVIL PROCEDURE 11 SANCTIONS AND LIMITATIONS OF THE SAME; REVIEW/ANALYZE [REDACTED]<br>[REDACTED]<br>REVIEW/ANALYZE [REDACTED]<br>[REDACTED] EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]<br>[REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED]<br>[REDACTED] REGARDING [REDACTED] | 6.30  | 2,047.50 |
| 09/27/21 | DAV  | ANALYZE MOTION FOR SANCTIONS AND EVALUATE RESPONSIVE ARGUMENTS TO SAME.   | 2.20  | 825.00   |
| 09/27/21 | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]   | 0.40  | 150.00   |
| 09/28/21 | DARA | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]; COMMUNICATE WITH [REDACTED]  | 2.60  | 845.00   |



JOHN SAENZ

MATTER #: 120206.000001

OCTOBER 20, 2021

INVOICE #: 3418854

PAGE 3

| DATE     | ID  | DESCRIPTION  | HOURS        | AMOUNT            |
|----------|-----|--|--------------|-------------------|
|          |     | <div>REGARDING</div> <div>REVIEW/ANALYZE CASE LAW AND SECONDARY SOURCES REGARDING</div> <div>DRAFT/REVISE AND FINALIZE RESPONSE TO MOTION TO SANCTION AND DISCUSS</div> <div>WITH DRAFT PROPOSED ORDER DENYING MOTION TO SANCTION AND DISCUSS WITH</div> |              |                   |
| 09/28/21 | DAV | REVISE RESPONSE TO MOTION FOR SANCTIONS.   | 2.60         | 975.00            |
| 09/28/21 | DAV | ANALYZE  | 1.30         | 487.50            |
|          |     | <b>TOTAL</b>   | <b>18.60</b> | <b>\$6,470.00</b> |



JOHN SAENZ

OCTOBER 20, 2021

MATTER #: 120206.000001

INVOICE #: 3418854

PAGE 4

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>     |
|-----------|-------------------|--------------|--------------|-------------------|
| DAV       | DAVID VANDERHIDER | 8.50         | 375.00       | 3,187.50          |
| DARA      | DANIEL A. RAY     | 10.10        | 325.00       | 3,282.50          |
|           | <b>TOTAL</b>      | <b>18.60</b> |              | <b>\$6,470.00</b> |



JOHN SAENZ

OCTOBER 20, 2021

MATTER #: 120206.000001

INVOICE #: 3418854

PAGE 5

**DISBURSEMENTS**

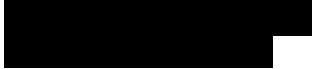
| DATE | DESCRIPTION                | AMOUNT      |
|------|----------------------------|-------------|
|      | PRINTING EXPENSES          | 8.20        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>8.20</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

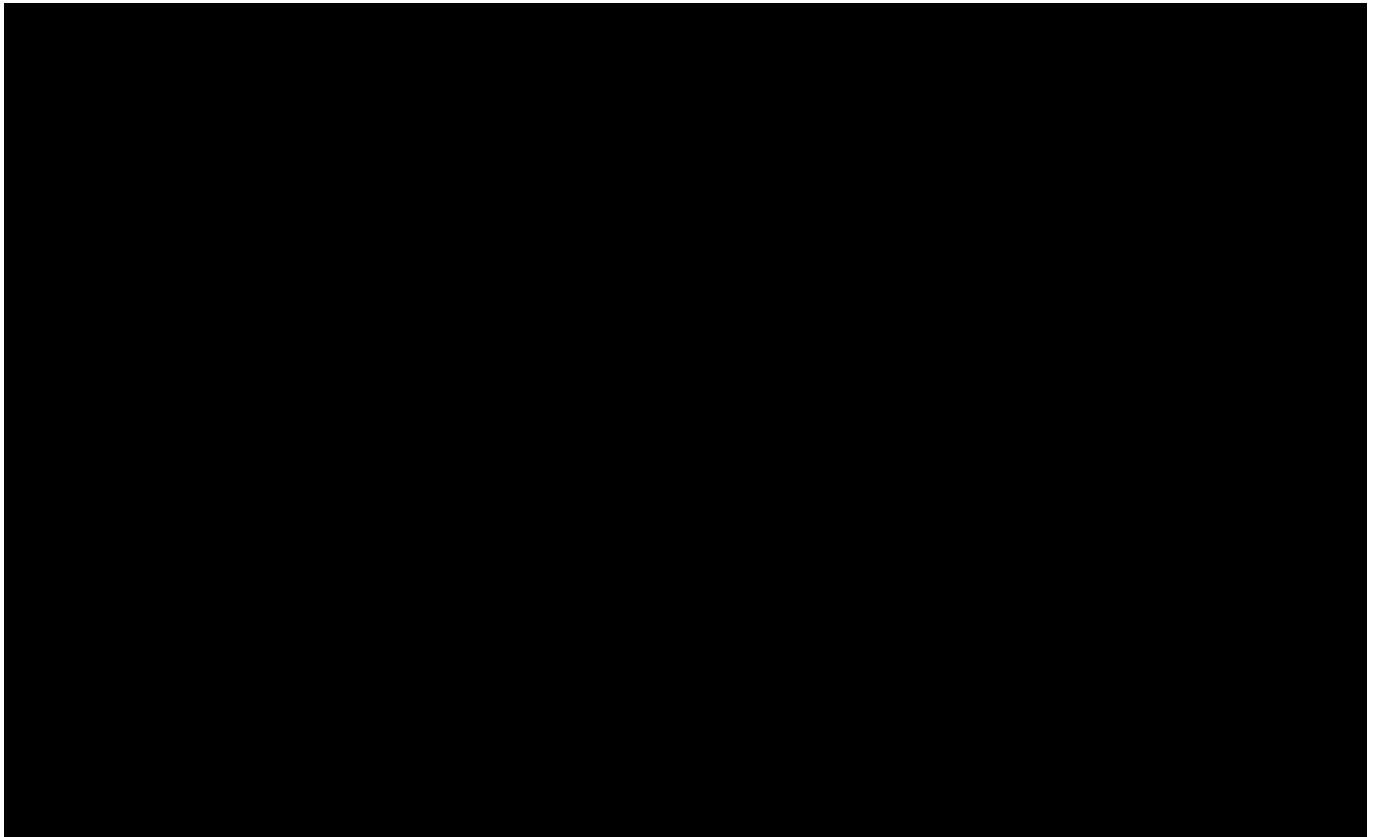
JOHN SAENZ



OCTOBER 20, 2021  
MATTER #: 120206.000001  
INVOICE #: 3418854

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 6,470.00        |
| DISBURSEMENTS        |           | 8.20            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>6,478.20</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

DECEMBER 13, 2021  
MATTER #: 120206.000001  
INVOICE #: 3427995

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |               |
|----------------------|-----------|---------------|
| FEES                 | \$        | 752.50        |
| DISBURSEMENTS        |           | 7.10          |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>759.60</b> |



JOHN SAENZ

DECEMBER 13, 2021

MATTER #: 120206.000001

INVOICE #: 3427995

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE         | ID   | DESCRIPTION   | HOURS       | AMOUNT          |
|--------------|------|---|-------------|-----------------|
| 11/05/21     | DAV  | REVIEW ORDER DENYING MOTION FOR SANCTIONS.  | 0.50        | 187.50          |
| 11/15/21     | DAV  | ANALYZE [REDACTED]  | 0.30        | 112.50          |
| 11/15/21     | DARA | DISCUSS [REDACTED] WITH [REDACTED]  | 0.30        | 97.50           |
| 11/19/21     | DARA | REVIEW/ANALYZE [REDACTED]<br>AND DISCUSS [REDACTED] WITH [REDACTED]                                       | 0.40        | 130.00          |
| 11/19/21     | DAV  | REVIEW MAGISTRATE RECOMMENDATION ON ZROBLACK'S<br>FAILURE TO RETAIN COUNSEL AND STATUS OF PENDING CLAIMS. | 0.40        | 150.00          |
| 11/19/21     | DAV  | COORDINATE WITH [REDACTED] REGARDING [REDACTED]   | 0.20        | 75.00           |
| <b>TOTAL</b> |      |   | <b>2.10</b> | <b>\$752.50</b> |



JOHN SAENZ

DECEMBER 13, 2021

MATTER #: 120206.000001

INVOICE #: 3427995

PAGE 3

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>   |
|-----------|-------------------|--------------|--------------|-----------------|
| DAV       | DAVID VANDERHIDER | 1.40         | 375.00       | 525.00          |
| DARA      | DANIEL A. RAY     | 0.70         | 325.00       | 227.50          |
|           | <b>TOTAL</b>      | <b>2.10</b>  |              | <b>\$752.50</b> |





JOHN SAENZ

DECEMBER 13, 2021

MATTER #: 120206.000001

INVOICE #: 3427995

PAGE 4

**DISBURSEMENTS**

| DATE     | DESCRIPTION  | AMOUNT      |
|----------|--|-------------|
| 08/17/21 | VENDOR: TEXAS SECRETARY OF STATE; INVOICE#: 545703084:AUG2021; DATE: 10/3/2021 - WEB INQUIRY | 1.00        |
| 10/15/21 | VENDOR: PACER800-676-6856IR  | 3.30        |
|          | VENDOR INVOICE #: 68617-100 DATE: 10/15/2021 COPIES OF PLEADINGS/DOCKET PRINTING EXPENSES    | 2.80        |
|          | <b>TOTAL DISBURSEMENTS</b>   | <b>7.10</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

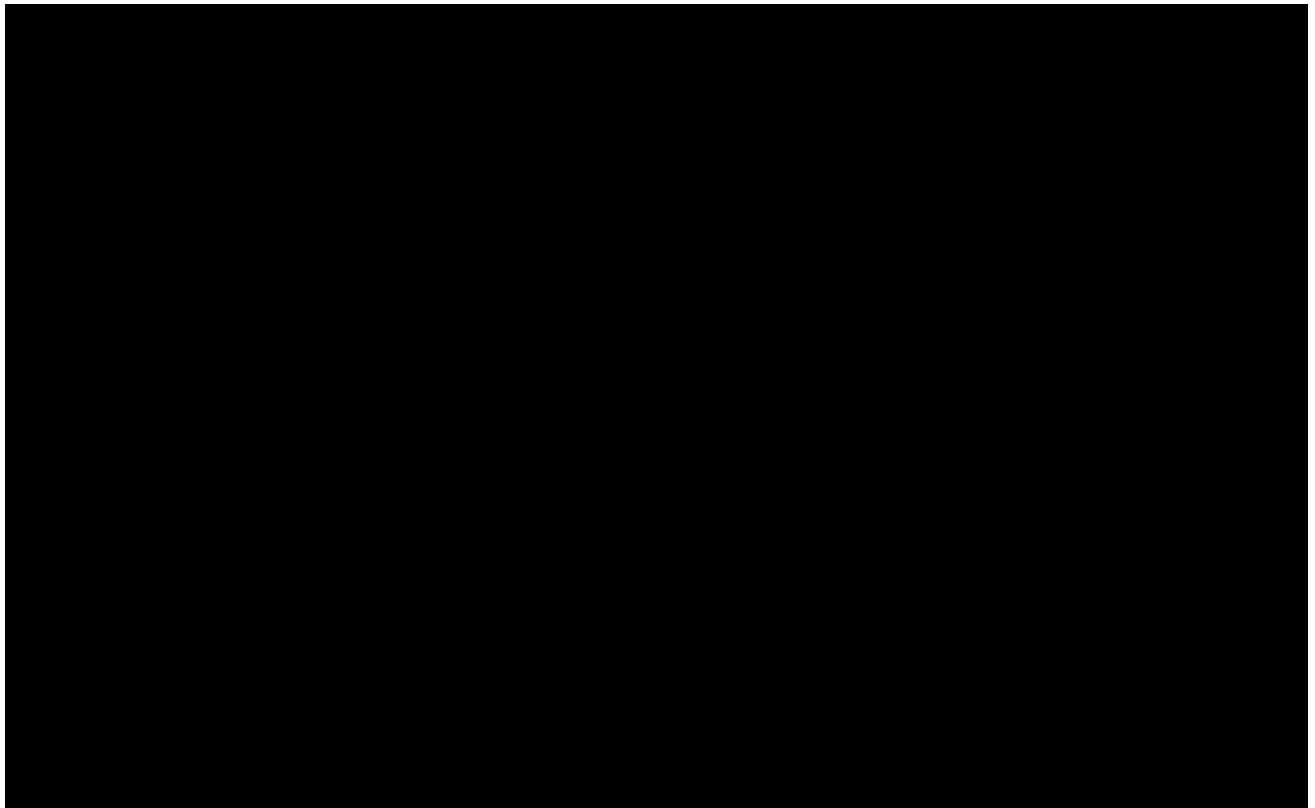
JOHN SAENZ



DECEMBER 13, 2021  
MATTER #: 120206.000001  
INVOICE #: 3427995

|                      |           |               |
|----------------------|-----------|---------------|
| FEES                 | \$        | 752.50        |
| DISBURSEMENTS        |           | 7.10          |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>759.60</b> |

REMITTANCE





400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

JOHN SAENZ  


**DUE UPON RECEIPT**

JANUARY 26, 2022  
MATTER #: 120206.000001  
INVOICE #: 3434260

*FOR PROFESSIONAL SERVICES RENDERED*

**RE: ZROBLACK CONTRACT DISPUTE**

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 5,317.50        |
| DISBURSEMENTS        |           | 2.60            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>5,320.10</b> |



JOHN SAENZ

MATTER #: 120206.000001

JANUARY 26, 2022

INVOICE #: 3434260

PAGE 2

**RE: ZROBLACK CONTRACT DISPUTE**

| DATE         | ID   | DESCRIPTION  | HOURS        | AMOUNT            |
|--------------|------|--|--------------|-------------------|
| 12/02/21     | DAV  | TELEPHONE CALL WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]  | 0.70         | 262.50            |
| 12/06/21     | DARA | REVIEW/ANALYZE LIVE PLEADINGS AND RECENT ORDERS FROM THE COURT; BEGIN DRAFTING SAENZ'S MOTION FOR JUDGMENT ON THE PLEADINGS AS TO REMAINING CLAIMS OF JONATHAN VILLAREAL, INDIVIDUALLY.  | 3.40         | 1,105.00          |
| 12/07/21     | DARA | DRAFT SAENZ'S MOTION FOR JUDGMENT ON THE PLEADINGS AS TO REMAINING CLAIMS OF JONATHAN VILLAREAL, INDIVIDUALLY; REVIEW/ANALYZE CASE LAW AND SECONDARY SOURCES IN SUPPORT OF THE SAME; EMAIL CORRESPONDENCE WITH [REDACTED]<br>[REDACTED] REGARDING [REDACTED] | 4.80         | 1,560.00          |
| 12/08/21     | DARA | (NO CHARGE) CONFERENCE CALL WITH [REDACTED]<br>REGARDING [REDACTED]  | 0.00         | 0.00              |
| 12/08/21     | DAV  | REVISE MOTION FOR JUDGMENT ON THE PLEADINGS OR, IN THE ALTERNATIVE MOTION TO DISMISS.  | 2.90         | 1,087.50          |
| 12/09/21     | DAV  | FINALIZE PROPOSED ORDER ON MOTION FOR JUDGMENT ON THE PLEADINGS OR, IN THE ALTERNATIVE, MOTION TO DISMISS.   | 0.20         | 75.00             |
| 12/09/21     | DAV  | FINALIZE MOTION FOR JUDGMENT ON THE PLEADINGS OR, IN THE ALTERNATIVE, MOTION TO DISMISS.   | 2.30         | 862.50            |
| 12/09/21     | LJO1 | REVIEW AND FILE RULE 12(C) MOTION FOR JUDGMENT ON THE PLEADINGS WITH THE COURT.  | 0.20         | 40.00             |
| 12/09/21     | LJO1 | DRAFT [REDACTED]   | 0.50         | 100.00            |
| 12/13/21     | DAV  | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]  | 0.20         | 75.00             |
| 12/13/21     | DARA | (NO CHARGE) REVIEW/ANALYZE [REDACTED]<br>[REDACTED] AND DISCUSS [REDACTED]   | 0.00         | 0.00              |
| 12/13/21     | DAV  | REVIEW ORDER ADOPTING MAGISTRATE'S RECOMMENDATIONS AND DISMISSING ZROBLACK'S CLAIMS.   | 0.40         | 150.00            |
| <b>TOTAL</b> |      |  | <b>15.60</b> | <b>\$5,317.50</b> |



JOHN SAENZ

JANUARY 26, 2022

MATTER #: 120206.000001

INVOICE #: 3434260

PAGE 3

**BILLING SUMMARY**

| <b>ID</b> | <b>TIMEKEEPER</b> | <b>HOURS</b> | <b>RATES</b> | <b>AMOUNT</b>     |
|-----------|-------------------|--------------|--------------|-------------------|
| DAV       | DAVID VANDERHIDER | 6.70         | 375.00       | 2,512.50          |
| DARA      | DANIEL A. RAY     | 8.20         | 325.00       | 2,665.00          |
| LJO1      | LISA O'SULLIVAN   | 0.70         | 200.00       | 140.00            |
|           | <b>TOTAL</b>      | <b>15.60</b> |              | <b>\$5,317.50</b> |



JOHN SAENZ

JANUARY 26, 2022

MATTER #: 120206.000001

INVOICE #: 3434260

PAGE 4

**DISBURSEMENTS**

| DATE | DESCRIPTION                | AMOUNT      |
|------|----------------------------|-------------|
|      | PRINTING EXPENSES          | 2.60        |
|      | <b>TOTAL DISBURSEMENTS</b> | <b>2.60</b> |



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

**DUE UPON RECEIPT**

JOHN SAENZ



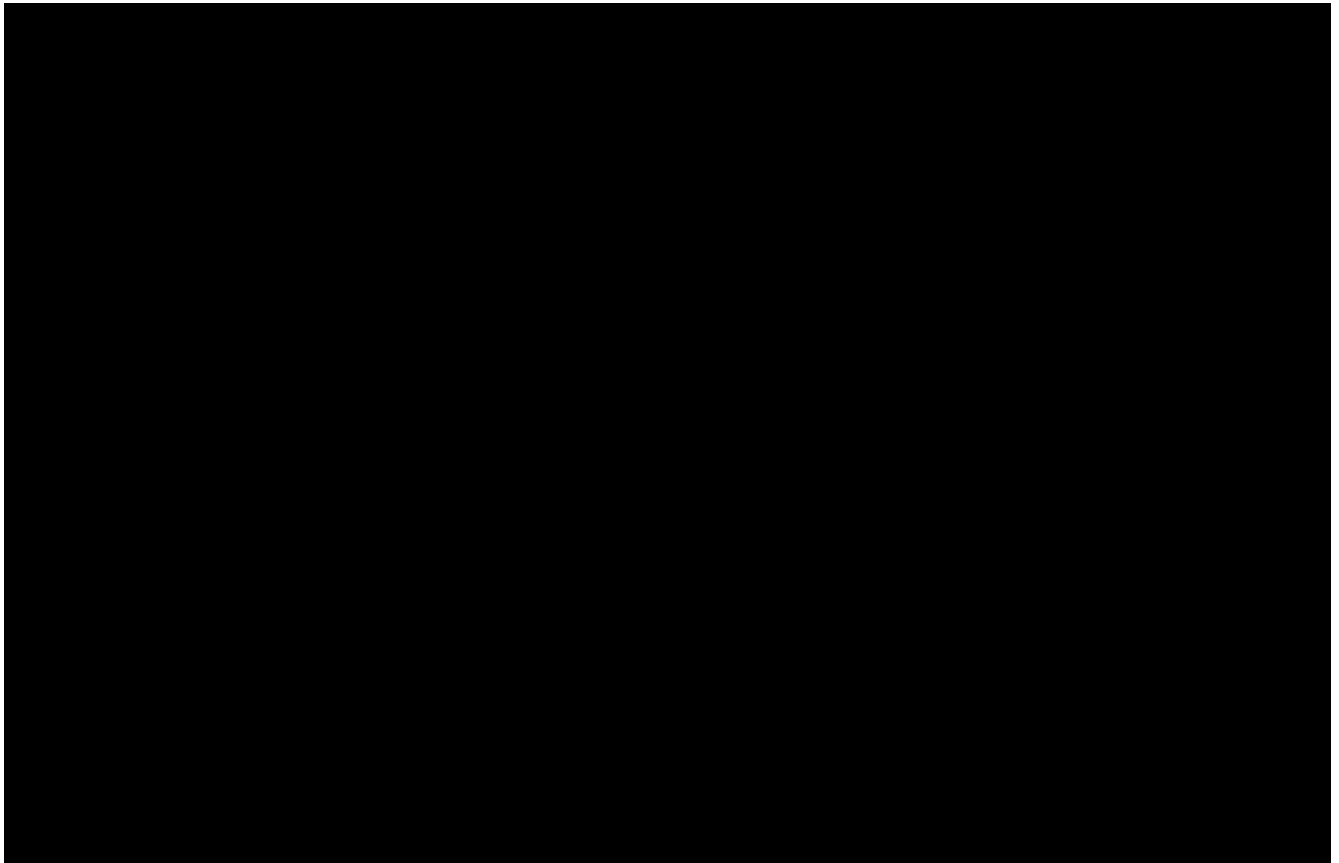
JANUARY 26, 2022

MATTER #: 120206.000001

INVOICE #: 3434260

|                      |           |                 |
|----------------------|-----------|-----------------|
| FEES                 | \$        | 5,317.50        |
| DISBURSEMENTS        |           | 2.60            |
| <b>INVOICE TOTAL</b> | <b>\$</b> | <b>5,320.10</b> |

REMITTANCE



Prebill #: 2388655

04/12/22 16:25:30

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**Matter Details**

Client: 120206 - JOHN SAENZ

**Matter:** 000001 – ZROBLACK CONTRACT DISPUTE

Bill Atty: Vanderhider, David (31005)

Resp Atty: Vanderhider, David (31005)

Services Rendered for the Period Through 04/12/22 in connection with ZROBLACK CONTRACT DISPUTE

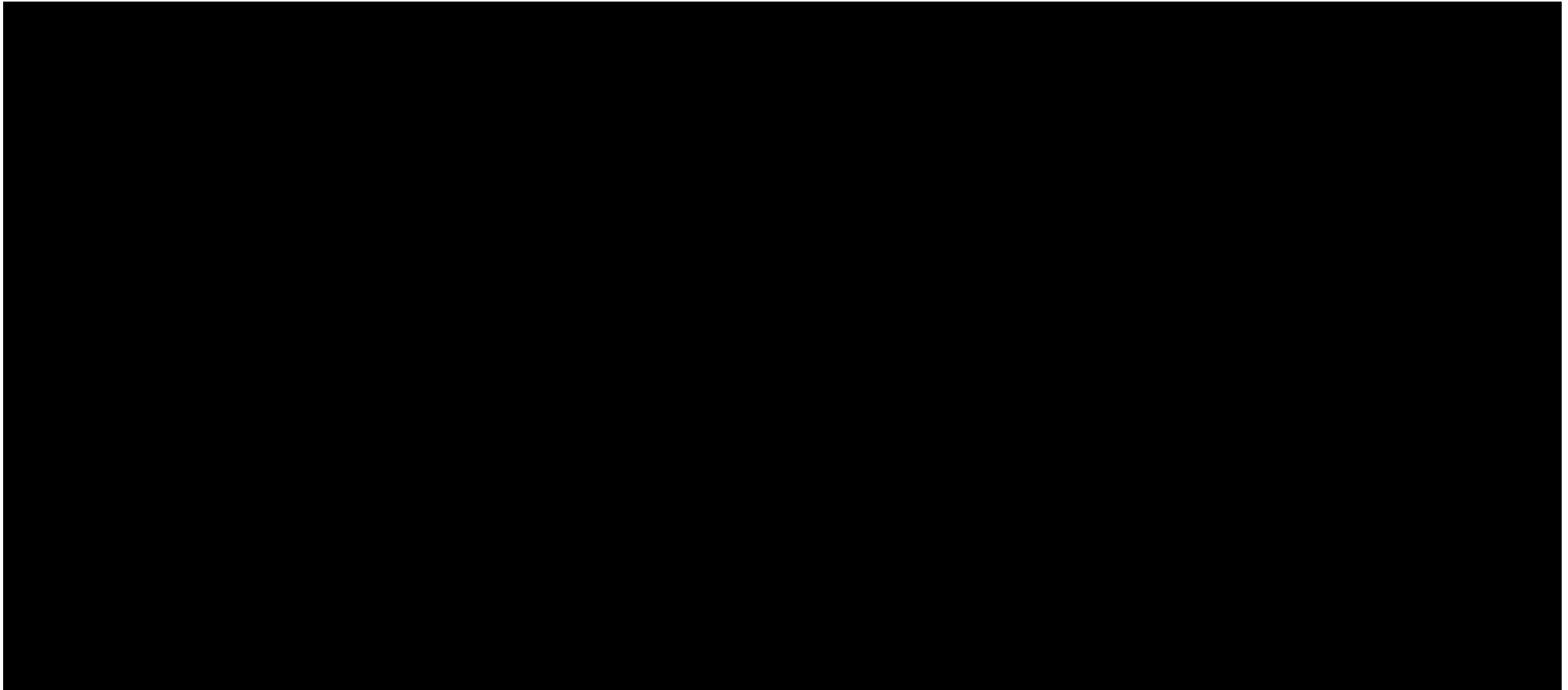
**Payor Details**

JOHN SAENZ

Open Date: 06/23/20

Bill Group: MAIN

Bill Type: Single





Prebill #: 2388655

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## TIME DETAIL (through 04/12/2022)

| Time ID  | Tkpr ID | Date     | Task Activity Narrative  | Bill Hours | Bill Rate | Bill Amount | Edit: |
|----------|---------|----------|--|------------|-----------|-------------|-------|
| 21994275 | DAV     | 03/04/22 | Review report and recommendation for motion for judgment on the pleadings.                                       | 0.40       | 375.00    | 150.00      | _____ |
| 21994279 | DAV     | 03/07/22 | Email correspondence with [REDACTED] regarding [REDACTED]<br>[REDACTED]  | 0.40       | 375.00    | 150.00      | _____ |
| 21993498 | DAV     | 03/10/22 | Telephone call with [REDACTED] regarding [REDACTED]  | 0.40       | 375.00    | 150.00      | _____ |
| 21996480 | DAV     | 03/21/22 | Analyze grounds for [REDACTED]   | 0.40       | 375.00    | 150.00      | _____ |
| 21993697 | DAV     | 03/22/22 | Review information and evaluate procedural posture and action items regarding potential dismissal.               | 1.30       | 375.00    | 487.50      | _____ |
| 21993766 | DAV     | 03/22/22 | Coordinate with [REDACTED] regarding [REDACTED]<br>[REDACTED]  | 0.50       | 375.00    | 187.50      | _____ |
| 21985168 | ELHA    | 03/22/22 | Review Magistrate Judge's Report and Recommendation [REDACTED]<br>[REDACTED]                                     | 0.20       | 325.00    | 65.00       | _____ |
| 21985172 | ELHA    | 03/22/22 | Confer with [REDACTED] regarding [REDACTED]<br>[REDACTED]  | 0.50       | 325.00    | 162.50      | _____ |
| 21985369 | ELHA    | 03/23/22 | Research [REDACTED]  | 3.60       | 325.00    | 1,170.00    | _____ |
| 21979261 | ELHA    | 03/23/22 | Begin drafting [REDACTED] Motion to Dismiss Counterclaims Without Prejudice.                                     | 3.60       | 325.00    | 1,170.00    | _____ |
| 21985415 | ELHA    | 03/23/22 | Draft [REDACTED]<br>[REDACTED]   | 0.50       | 325.00    | 162.50      | _____ |
| 21996789 | DAV     | 03/23/22 | Analyze legal authorities regarding dismissal without prejudice and entry of final judgment.                     | 0.60       | 375.00    | 225.00      | _____ |
| 21985441 | ELHA    | 03/24/22 | Continue drafting [REDACTED] Motion to Dismiss Counterclaims Without Prejudice.                                  | 4.10       | 325.00    | 1,332.50    | _____ |
| 21985562 | ELHA    | 03/24/22 | Prepare revisions to Motion to Dismiss Counterclaims Without Prejudice.  | 0.30       | 325.00    | 97.50       | _____ |
| 21985579 | ELHA    | 03/24/22 | Confer with [REDACTED] regarding [REDACTED]<br>[REDACTED]  | 0.30       | 325.00    | 97.50       | _____ |
| 21985595 | ELHA    | 03/24/22 | Research [REDACTED]<br>[REDACTED]  | 1.60       | 325.00    | 520.00      | _____ |
| 21994183 | DAV     | 03/24/22 | Review prior pleadings and exhibits in preparation of motion to dismiss without prejudice and to enter judgment. | 1.40       | 375.00    | 525.00      | _____ |

Prebill #: 2388655

Client: 120206 – JOHN SAENZ

Matter: 000001 – ZROBLACK CONTRACT DISPUTE

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| Time ID  | Tkpr ID | Date     | Task Activity Narrative  | Bill Hours | Bill Rate | Bill Amount | Edit: |
|----------|---------|----------|--|------------|-----------|-------------|-------|
| 21981417 | DAV     | 03/24/22 | Revise Motion to Dismiss Without Prejudice and to Enter Judgment.  | 1.90       | 375.00    | 712.50      | _____ |
| 21981418 | DAV     | 03/24/22 | Evaluate [REDACTED]  | 1.10       | 375.00    | 412.50      | _____ |
| 21982609 | LJO1    | 03/25/22 | Revise and finalize Fourth Motion to Dismiss and [REDACTED]  | 0.70       | 165.00    | 115.50      | _____ |
| 21982664 | LJO1    | 03/25/22 | Review of court order Dkt 80 regarding Mag. Judge ruling [Dkt 78] adopted in full regarding Motion for Judgment and Third Motion to Dismiss.                                       | 0.20       | 165.00    | 33.00       | _____ |
| 21985688 | ELHA    | 03/25/22 | Review draft of Motion to Dismiss Counterclaims Without Prejudice and Entry of Judgment in light of District Court's adoption of the Magistrate Judge's Report and Recommendation. | 0.30       | 325.00    | 97.50       | _____ |
| 21985693 | ELHA    | 03/25/22 | Review District Court's Order Adopting Report and Recommendation in Full.  | 0.20       | 325.00    | 65.00       | _____ |
| 21993712 | DAV     | 03/25/22 | Finalize motion to dismiss without prejudice and to enter judgment based on Court order on latest report and recommendation.   | 2.20       | 375.00    | 825.00      | _____ |
| 21994166 | DAV     | 03/25/22 | Finalize proposed order on motion to dismiss without prejudice and to enter judgment.  | 0.40       | 375.00    | 150.00      | _____ |
| 21996820 | DAV     | 03/25/22 | Email correspondence with [REDACTED] regarding [REDACTED]  | 0.10       | 375.00    | 37.50       | _____ |
| 21996832 | DAV     | 03/25/22 | Review and analyze order adopting latest report and recommendation.  | 0.20       | 375.00    | 75.00       | _____ |
| 21998537 | DAV     | 03/30/22 | Review Final Judgment entered by the Court.  | 0.10       | 375.00    | 37.50       | _____ |
| 21998661 | DAV     | 03/30/22 | Coordinate with [REDACTED] regarding [REDACTED]  | 0.20       | 375.00    | 75.00       | _____ |
| 21998677 | DAV     | 03/30/22 | Review order returning case to District Court Judge.   | 0.10       | 375.00    | 37.50       | _____ |
| 22007018 | ELHA    | 04/01/22 | Begin preparing to draft Motion for Attorney's Fees.   | 0.50       | 325.00    | 162.50      | _____ |
| 22007020 | ELHA    | 04/01/22 | Begin reviewing [REDACTED]   | 0.50       | 325.00    | 162.50      | _____ |
| 22007014 | ELHA    | 04/03/22 | Continue reviewing case law in Texas regarding motions for attorney's fees.  | 1.50       | 325.00    | 487.50      | _____ |
| 22006809 | ELHA    | 04/04/22 | Begin drafting Motion for Attorney's Fees.   | 2.00       | 325.00    | 650.00      | _____ |
| 22008893 | VEF1    | 04/04/22 | Review email with Dykema invoices and prepare for redactions.  | 0.10       | 160.00    | 16.00       | _____ |
| 21988023 | ELHA    | 04/04/22 | Continue reviewing [REDACTED]  | 4.70       | 325.00    | 1,527.50    | _____ |
| 22007610 | ELHA    | 04/05/22 | Continue drafting Motion for Attorney's Fees.  | 6.00       | 325.00    | 1,950.00    | _____ |
| 22008894 | VEF1    | 04/05/22 | Prepare redactions to invoices for motion.   | 2.00       | 160.00    | 320.00      | _____ |

**DISBURSEMENT DETAIL (04/12/2022)**

| Disb ID             | Timekeeper       | Date     | Disb Desc               | Narrative         | Qty | Prt | Amount | Edit: |
|---------------------|------------------|----------|-------------------------|-------------------|-----|-----|--------|-------|
| 39276292            | Archuleta, Jesus | 03/25/22 | 111 - Printing Expenses | PRINTING EXPENSES | 20  | Y   | 4.00   |       |
| Total Disbursements |                  |          |                         |                   |     |     | \$4.00 |       |

Prebill #: 2388655

Client: 120206 – JOHN SAENZ

Matter: 000001 – ZROBLACK CONTRACT DISPUTE

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**SUMMARY BY TIMEKEEPER**

| <b>Tkpr ID</b> | <b>Office</b> | <b>Name</b>             | <b>Title</b> | <b>Bill Hrs</b> | <b>Std Rate</b> | <b>Bill Rate</b> | <b>Bill Amount</b> | <b>Edit:</b> |
|----------------|---------------|-------------------------|--------------|-----------------|-----------------|------------------|--------------------|--------------|
| DAV            | San Antonio   | Vanderhider, David      | Member       | 11.70           | 460.00          | 375.00           | 4,387.50           | _____        |
| ELHA           | San Antonio   | Hartsell, Elizabeth, L. | Associate    | 55.40           | 370.00          | 325.00           | 18,005.00          | _____        |
| LJO1           | San Antonio   | O'sullivan, Lisa        | Paralegal    | 1.60            | 165.00          | 165.00           | 264.00             | _____        |
| VEF1           | San Antonio   | Flores, Vicki           | Staff        | 2.50            | 160.00          | 160.00           | 400.00             | _____        |
|                |               |                         |              | <b>71.20</b>    |                 |                  | <b>\$23,056.50</b> |              |

**SUMMARY BY DISB TYPE**

| <b>Disb Type</b>           | <b>Description</b> | <b>Amount</b> | <b>Edit:</b> |
|----------------------------|--------------------|---------------|--------------|
| 111                        | Printing Expenses  | 4.00          | _____        |
| <b>Total Disbursements</b> |                    | <b>\$4.00</b> |              |

Prebill #: 2388655

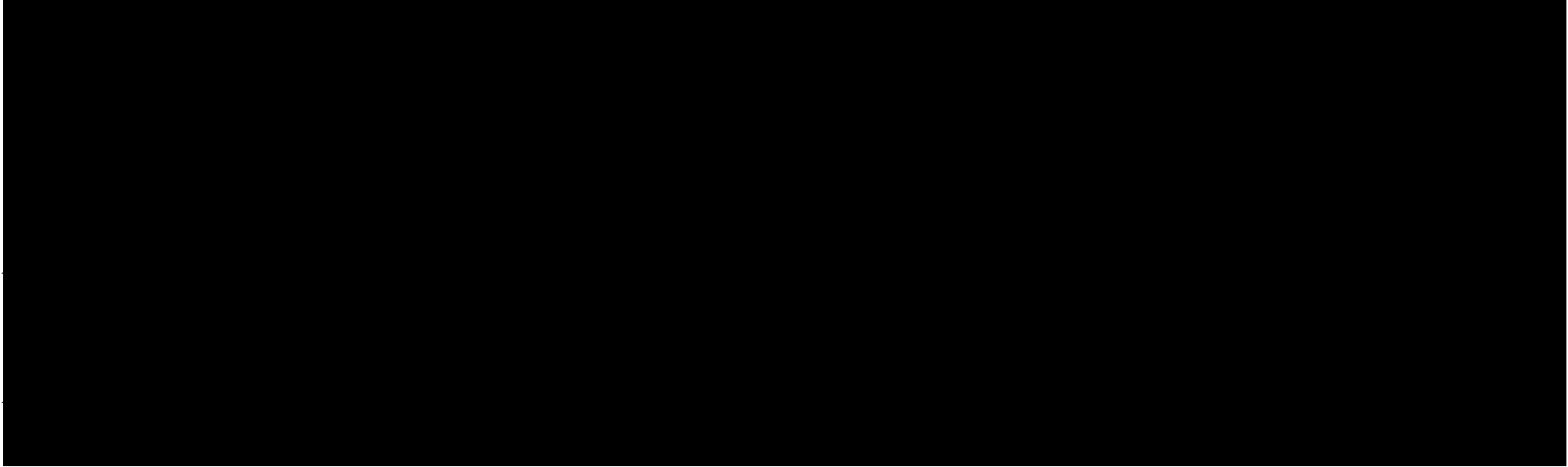
Client: 120206 – JOHN SAENZ

Matter: 000001 – ZROBLACK CONTRACT DISPUTE

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**ADDITIONAL BILLING INFORMATION**



# Exhibit B

**Exhibit B**

|          |      |  |      |          |
|----------|------|--|------|----------|
| 08/06/21 | DARA | REVIEW/ANALYZE TEXT ORDER FROM THE COURT GRANTING MOTION FOR EXTENSION OF TIME; DISCUSS [REDACTED]<br>[REDACTED] WITH [REDACTED]<br>REVIEW/ANALYZE [REDACTED]<br>[REDACTED]  | 0.80 | 260.00   |
| 08/09/21 | DARA | EMAIL CORRESPONDENCE WITH JONATHAN VILLAREAL REGARDING AGREEMENT TO EXTENSION OF TIME TO FILE RESPONSIVE PLEADING; DRAFT PROPOSED STIPULATION AND MOTION FOR EXTENSION OF TIME, AS WELL AS PROPOSED ORDER GRANTING THE SAME; ADDITIONAL CORRESPONDENCE WITH JONATHAN VILLAREAL REGARDING OPPOSITION TO PROPOSED STIPULATION AND MOTION; EMAIL CORRESPONDENCE AND TELEPHONE CONFERENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]; DISCUSS [REDACTED]<br>[REDACTED] WITH [REDACTED] | 3.40 | 1,105.00 |
| 08/12/21 | DARA | BEGIN DRAFTING DEFENDANT'S ORIGINAL ANSWER TO PLAINTIFF'S FIRST AMENDED COMPLAINT.   | 4.30 | 1,397.50 |
| 08/13/21 | DARA | CONTINUE DRAFTING DEFENDANT'S ANSWER TO PLAINTIFFS' FIRST AMENDED COMPLAINT; DISCUSS [REDACTED]<br>[REDACTED] WITH [REDACTED]  | 2.60 | 845.00   |
| 08/16/21 | DARA | DRAFT/REVISE INITIAL DRAFT OF ANSWER AND COUNTERCLAIM; DISCUSS THE SAME WITH [REDACTED]; EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]   | 3.10 | 1,007.50 |
| 08/17/21 | DAV  | REVIEW AND REVISE ANSWER TO FIRST AMENDED COMPLAINT AND ORIGINAL COUNTERCLAIM.   | 2.10 | 787.50   |
| 08/17/21 | DARA | DRAFT/REVISE AND FINALIZE ANSWER AND COUNTERCLAIM; TELEPHONE CALL WITH [REDACTED] [REDACTED] REGARDING [REDACTED] FOLLOW-UP EMAIL CORRESPONDENCE REGARDING [REDACTED]  | 2.90 | 942.50   |
| 08/18/21 | BLC1 | COMMUNICATE WITH [REDACTED] CONCERNING [REDACTED]<br>[REDACTED]  | 0.40 | 80.00    |
| 08/18/21 | DAV  | EVALUATE [REDACTED]<br>[REDACTED]  | 0.40 | 150.00   |
| 08/18/21 | DAV  | TELEPHONE CALL WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]  | 0.80 | 300.00   |
| 08/18/21 | DAV  | REVIEW AND REVISE ANSWER TO FIRST AMENDED COMPLAINT AND ORIGINAL COUNTERCLAIM.   | 1.70 | 637.50   |
| 08/18/21 | DARA | EMAIL CORRESPONDENCE WITH [REDACTED] REGARDING [REDACTED]<br>[REDACTED]; EVALUATE [REDACTED] TEAMS<br>CONFERENCE WITH [REDACTED] TO [REDACTED]<br>[REDACTED]<br>[REDACTED] DRAFT/REVISE AND FINALIZE ANSWER AND COUNTERCLAIM ACCORDINGLY, AND DISCUSS THE SAME WITH [REDACTED] COORDINATE [REDACTED]   | 2.70 | 877.50   |

# Exhibit C



# David A. Vanderhider

## Member



## Contact

San Antonio  
210-554-5484  
dvanderhider@dykema.com

## Overview

Bottom lines and reputations, livelihoods and long-term objectives all hang in the balance when a dispute threatens to delay or derail a large construction project.

A seasoned and successful litigator, David Vanderhider understands the stakes when clients turn to him to protect their interests and resolve costly and disruptive conflicts. With creativity and focus, David finds solutions where others can't and provides clear, consistent counsel that clients can rely on with confidence.

David's construction and commercial litigation practice encompasses all manner of complex claims, including those involving energy and real estate projects and business disputes.

David also has extensive experience drafting and negotiating various contracts, lien notices, lien affidavits, lien releases, performance bond claims, and payment bond claims for owners, general contractors, subcontractors, architects, and engineers in public and private construction projects.

In every matter, he brings to the table a formidable combination of technical, legal, and business acumen that allows him to craft strategies that align with and facilitate his clients' goals.

When clients reach out to him, David addresses their concerns quickly yet thoroughly. When they seek to understand their risks and options, he empowers them with the information they need to make informed decisions.

When they need a road map that leads to a cost-effective and favorable outcome, David charts a course that focuses on issues that matter while steering clear of irrelevant and counterproductive distractions, often leading to quick resolutions.

And when they need to take cases through trial and appeal, they know that David has a successful track record which bodes well for them.

## Areas of client focus

### Practices

Litigation  
Data Privacy and Cybersecurity  
Real Estate  
Commercial Litigation

### Industries

Construction  
Oil and Gas  
Energy and Natural Resources

Equally adept at forceful courtroom advocacy and effective negotiation, David has earned the trust of countless construction clients who value his candor and clarity. In turn, he values the long-term, enduring client relationships that form the bedrock of his practice.

## Experience

### Construction Litigation

- Successful representation of a Texas municipality acting as owner in multiple construction-related disputes and arbitrations involving issues of breach of contract, delay damages, change orders, cost overruns, consequential damages, and statutory claims specific to governmental entities.
- Successful representation of a general contractor with national operations in an arbitration filed by a joint venture partner related to the design, construction and maintenance of a public highway project, resulting in a very favorable settlement less than two weeks before final hearing.
- Successful representation of a general contractor with global operations in a dispute with the owner of a frac sand facility, resulting in an extremely favorable, multi-million dollar settlement to the client shortly after litigation commenced.
- Successful representation of a Texas municipality in multiple performance bond claims against sureties.
- Successful representation of a local contractor in various claims asserted by project owners, resulting in favorable settlements to the client.
- Successful representation of a subcontractor in litigation against the owner and general contractor of a Dallas County construction project, resulting in settlement of the entire amount invoiced by subcontractor to complete the project at issue.
- Successful representation of a subcontractor in litigation against the owner and general contractor arising out of construction of a South Texas compressor facility, resulting in a favorable settlement to the client.
- Successful representation of a subcontractor in litigation against the general contractor of a Hidalgo County construction project, resulting in settlement of the entire amount demanded by the client.
- Successful representation of a locally-based building owner with extensive national operations in a performance bond dispute with a bonding company, resulting in settlement of the entire amount demanded by the client for all costs and expenses to complete of the project.
- Successful representation of a locally-based building owner with extensive national operations in an arbitration against an architect and two general contractors regarding the design and construction of the project.

### Energy Litigation

- Trial counsel to an electric cooperative in South Texas in a case involving a key 2,200-acre lignite lease in McMullen County, resulting in a directed verdict on Plaintiffs' claims against the client and a jury verdict in the client's favor on its counterclaims (including damages).
- Trial counsel to an electric cooperative in South Texas in a significant case involving a 20" natural gas liquids pipeline, resulting in a mandatory permanent injunction requiring removal of the defendant's pipeline from the client's leased premises and a seven-figure attorneys' fees award.
- Obtained summary judgment for a publicly-traded exploration and production company on all claims asserted by a surface owner in Edwards County, Texas, including claims for trespass, fraud, gross negligence, negligence, and alleged violations of the Texas Business and Commerce Code.

- Obtained a summary judgment for a publicly-traded exploration and production company on five different causes of action asserted by a local landowner, and then obtained a directed verdict at trial on plaintiff's remaining claim.
- Obtained summary judgment in McMullen County on behalf of plaintiff in litigation involving distribution and use of oil and gas royalties and bonus payments.
- Obtained summary judgment on behalf of defendant in Hidalgo County in litigation involving alleged damage to real property, purportedly caused by oil and gas drilling operations.
- Trial counsel to TXCO Resources Inc., a publicly traded exploration and production (E&P) company in successful prosecution of trade secret misappropriation claims against Peregrine Petroleum, LLC. Following a 41-day trial spanning late May through September 2011, the court awarded judgment in favor of Reorganized TXCO, Inc. (reorganized through Chapter 11) on its claims for misappropriation of trade secrets and entered a multi-million dollar damage award. The court found that Peregrine solicited, obtained and misappropriated a substantial amount of TXCO's trade secret information and data, both through its meetings with TXCO under a confidentiality agreement and through additional, improper channels.

### **Real Estate Litigation**

- Successful representation of a tenant plaintiff in contract dispute with landlord defendant, obtaining a favorable settlement following successful pre-trial briefing.
- Obtained summary judgments in Bexar County on behalf of defendants in a complex commercial real estate dispute. Following an eight-figure demand by Plaintiff, the Court dismissed each of Plaintiff's claims, including DTPA violations, breach of fiduciary duty, common law fraud, statutory fraud, negligence, negligent misrepresentation, and Texas Securities Act violations. The Fourth Court of Appeals of Texas upheld the trial court's dismissal of all claims against defendants.

### **Products Litigation**

- Successful representation of a manufacturer with a nationwide presence in multiple litigation matters and disputes with purchasers and distributors involving allegations of negligence, breaches of warranty and DTPA violations, as well as issues related to statutory and contractual indemnity claims.
- Successful representation of a manufacturer defendant in litigation related to personal injuries sustained in an accident, resulting in no net payment by client upon settlement.
- Successful representation of a leading provider of natural gas contract compression services in a personal injury lawsuit, resulting in a non-suit of all claims against the client without payment.

### **Complex Business Litigation**

- Obtained favorable settlement for defendant / counter-plaintiff in case pending in the United States District Court for the Western District of Texas. Following a seven-figure demand by plaintiff / counter-defendant, the settlement resulted in payment to the defendant / counter-plaintiff less than one month before trial.
- Successful litigation representation of an aviation industry client, resulting in full recovery of all damages, costs, expenses, attorneys' fees and interest following entry of final judgment.

## **Credentials**

### **Education**

- St. Mary's University School of Law, J.D., *summa cum laude*, 2009
- Baylor University, B.A., Honors Program, 2006

## **Bar Admissions**

- Texas, 2009

## **Professional Recognition**

- Selected for Leadership San Antonio Class 46, 2021
- Recognized by *San Antonio Magazine* in "San Antonio's Top Attorneys" for Construction, 2019-2021
- Recognized in *Texas Super Lawyers*® as a Rising Star for Business Litigation; Construction Litigation: Business, 2018-2022
- Recognized by *S.A. Scene* in "San Antonio's Best Lawyers" for Business Litigation
- *S.A. Scene*, "San Antonio's Rising Stars"
- Recognized as a *Top 10 Graduate* of the last decade by the St. Mary's Young Alumni Council, 2018
- John M. Harlan Society
- Phi Delta Phi, 2007
- Phi Alpha Theta, 2006

## **Affiliations**

### **Professional**

- State Bar of Texas Construction Law Section
- San Antonio Bar Association
- William S. Sessions American Inn of Court
- Former Member, Dykema Associates' Committee

### **Community**

- Former Board of Directors, Baylor Line Foundation (formerly Baylor Alumni Association)
- St. Mary's Law Journal, Editorial Board (2008 – 2009)
- San Antonio North Chamber Leadership Lab